



Northern States Power Company

Monticello Nuclear Generating Plant
2807 West County Road 75
Monticello, MN 55362

January 19, 2000

US Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

10 CFR Part 55
Section 55.11

MONTICELLO NUCLEAR GENERATING PLANT
Docket No. 50-263 License No. DPR-22

Request for Exemption From the Scheduling Requirements of 10 CFR 55.59

This letter requests an exemption from the scheduling requirements of 10 CFR 55.59(a)(1) and 55.59(c)(1). The proposed one time exemption would extend the end of the current licensed operator requalification cycle beyond the 10 CFR 55.59 limit of 24 months from March 9, 2000 to May 12, 2000. This request is submitted in accordance with the provisions of 10 CFR 55.11.

Due to 1) an unplanned outage in addition to two planned outages; 2) a delayed start of the second refueling outage; and 3) mid-cycle training program enhancements, the end of the 1998 Licensed Operator Requalification Program was rescheduled from March to May, 2000. On January 10, 2000, it was determined that the revised end of training cycle date did not meet the program requirement to complete the cycle within 24 months. This exemption would allow completion of the program in accordance with the revised date.

Granting the exemption would result in greater benefit to the health and safety of the public than would completing the requalification cycle within the 24 month time requirement. Additionally, strict application of the rule is not necessary to serve the underlying purpose of the rule. The following discussion provides the bases for the requested exemption, which is limited to the written operator requalification examination. The exemption request is based on the following points: 1) Operations involvement in outage execution provides a positive impact on shutdown safety; 2) The extension of the requalification cycle will allow for more effective examination due to upgrading the examination questions and validation of the new exams; 3) An increase

M003

in the scope of training resulting from training program improvements has improved operator performance; 4) The underlying purpose of the 24 month requirement is met by continuous observation and periodic testing during the course of the training cycle. Each of these points are discussed in the same order and in more detail below.

During outages, licensed plant operators are assigned critical outage related duties in addition to the staffing required by Technical Specifications in order to provide full shift coverage for outage activities. Assigned duties include fuel handling responsibilities, isolations, equipment and configuration control and duties associated with other aspects of outage work. These assignments enhance safety and minimize risk by providing for increased staffing to handle the workload associated with outage maintenance activities. Additionally, normal licensed operator duties such as establishing system lineups, filling and draining evolutions, surveillances and post-maintenance testing increase significantly during outages. Thus, licensed operator involvement is critical to execution of safe refueling outage operation and minimizing risk through the outage period. It is imperative that operations personnel remain focused on completion of a safe outage. To complete the training cycle within the 24 month regulatory requirement would significantly distract operations personnel from focusing on safe outage operation and would not be in the best interest of public health and safety.

Written exam preparation is in progress to provide a high quality examination validated in accordance with NUREG-1021, "Operator Licensing Examination Standards for Power Reactors." The best practices for exam validation per the guidance of NUREG-1021 suggest using licensed plant operators to provide validation of the examination questions. NSP intends to follow this best practice as a part of training improvement initiatives. This will ensure that the exam provides a meaningful test of operator knowledge and provides meaningful feedback for the performance based modifications to the requalification program, as discussed in NUREG-1262, "Answers to Questions at Public Meetings Regarding Implementation of Title 10, Code of Federal Regulations, Part 55 on Operators' Licenses." In light of exam security requirements, a significant number of operators would be required for the validation effort. Drawing operators from outage staffing to perform the validation in order to meet the original schedule would again be a distraction from safe outage focus which would not be in the best interest of outage and public safety.

Several mid training cycle improvements have been implemented which impacted the original training schedule but have proven to positively affect licensed operator performance. These improvements include:

- Increased simulator training sessions for the cycle;
- Increased formal simulator crew evaluations;
- Increased emphasis on operational standards;
- Operations team training, Observation training, targeted EOP training, facilitative critique training and emphasis on self-critical evaluation of performance.

Evaluations of recent operator performance have identified improved crew performance directly attributable to the increased training requirements. Weekly tests are given in the training cycle to assess operator knowledge and training effectiveness. While these tests are not the equivalent of a single comprehensive exam, they demonstrate ongoing qualification of licensed operators. The operator performance improvements are evidence of an effective training program and provide justification for extending the training cycle in that the operators have continuously demonstrated the ability to safely operate the plant.

Normal training scheduled to support the refueling outage will continue to be performed and the training schedule will be adjusted in the future to accommodate completing three requalification cycles within a six year term.

Granting this exemption will involve no significant environmental impact. The exemption will allow operators to focus on conducting safe outage operations and will allow effective completion of the requalification cycle. The exemption will not increase the risk of facility accidents. The consequences of an accident are not affected, due to continued demonstration of the ability to safely operate the plant. The exemption will not affect radiological or non-radiological effluents and will not have any other environmental impact.

Granting this exemption will not endanger life or property and will not present an undue risk to the public. This one time exemption is of benefit to the health and safety of the public since continued focus on outage safety and effective completion of the requalification cycle would be accomplished.

Based on the above, NSP concludes that this exemption request is warranted under the provisions of 10 CFR 55.11. The exemption is requested to be granted by February 11, 2000 and should remain in effect until May 12, 2000 at such time the written examinations are to be completed.

Please contact Doug Neve, Sr. Licensing Engineer, at (612) 295-1353 if you require additional information related to this request.

By 
Byron D. Day
Plant Manager
Monticello Nuclear Generating Plant

c: Regional Administrator-III, NRC
NRR Project Manager, NRC
Sr. Resident Inspector, NRC
State of Minnesota
Attn: Steve Minn
J Silberg, Esq.