



Northern States Power Company

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

May 16, 2000

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

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

Notification of Non-Utilization of
10 CFR 50, Appendix J Exemption

- Ref. 1 Letter, Wachter (NSP) to NRC, "Request for Exception from Certain Requirements of 10 CFR 50, Appendix J, "Primary Reactor Containment Leakage Testing for Water-Cooled Power Reactors", May 5, 1976.
- Ref. 2 NRC letter to NSP, Safety Evaluation by the Office of Nuclear Reactor Regulation Appendix J Review, License No. DPR-22, Northern States Power Company, Monticello Nuclear Generating Plant, Docket No. 50-263, June 3, 1984.

The purpose of this letter is to inform the NRC that Northern States Power no longer requires exemption from 10 CFR 50 Appendix J testing for penetrations X-39A and X-39B, previously granted by the NRC for the Monticello Nuclear Generating Plant (MNGP).

The Monticello USAR review project recently discovered a discrepancy pertaining to 10 CFR 50, Appendix J testing of containment isolation valves MO-2020, and MO-2021.

In Reference 1, MNGP requested an exemption from the testing requirements of 10 CFR 50, Appendix J for certain containment penetrations, including X-39A and X-39B (MO-2020 and MO-2021). Reference 1 states: "X-39A and X-39B would be pressurized by the RHR pumps during all stages of the accident. This pressure is well above the peak drywell accident pressure preventing any outleakage of the drywell gaseous atmosphere. There is no single active failure which could prevent pressurization of these lines. Since these lines cannot constitute a containment leakage path, testing of the isolation valves in these lines is unnecessary." The requested exemption was approved by the NRC in Reference 2.

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The basis for this exemption depends, in part, on the ability of the RHR pumps to supply high enough pressure to unseat the flex wedge disks and pressurize the bonnet area to greater than containment pressure. This is needed in order to prevent containment atmosphere from leaking past valve packing and body to bonnet seals. In 1986, an analysis was completed to determine water pressure needed to unseat the flex wedge disk on valves MO-2020 and MO-2021. The analysis concluded that under accident conditions, the RHR pumps may not supply enough pressure to unseat the disks. In light of the analysis contradicting the basis for NRC approval of the exemption, the Appendix J testing was completed and the exemption was never invoked for these valves.

This letter documents that MNGP tests MO-2020 and MO-2021 per Appendix J without invoking the approved exemption. Exemption from 10 CFR 50, Appendix J is not required for these valves. The USAR will be revised to clarify this.

Please contact Sam Shirey at (612) 295-1449 if you require additional information concerning this report.



Byron D. Day
Plant Manager

Monticello Nuclear Generating Plant

cc: Director, Office of Nuclear Regulatory Research
Regional Administrator-III, NRC
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