

Monticello Nuclear Generating Plant
2807 West County Road 75
Monticello, MN 55362-9637

Operated by Nuclear Management
Company LLC

October 5, 2000

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

10 CFR Part 50
Section 50.90

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

**Supplement 2 to "License Amendment Request Dated May 4, 2000
Revision to Technical Specification Administrative Controls
and Other Miscellaneous Changes"**

- Ref. 1 Letter from NSP to NRC, "License Amendment Request Dated May 4, 2000
Revision to Technical Specification Administrative Controls and Other
Miscellaneous Changes" May 4, 2000
- Ref. 2 Supplement to Letter from NSP to NRC, "License Amendment Request Dated
May 4, 2000 Revision to Technical Specification Administrative Controls and
Other Miscellaneous Changes" August 31, 2000

By Reference 1, NSP¹ requested a license amendment including several changes to the Monticello Technical Specifications. One of those changes was to add new requirements describing the course of action should it be discovered that a surveillance has not been performed when required. Recently, a question was raised regarding the meaning of the phrase "affected equipment" as used in Reference 1 and 2. The purpose of this letter is to explain this wording. To ensure future clarity on this issue, a Bases addition is proposed.

On September 21, 2000 a conference call was held between NRC Staff members and NMC regarding duties for the proposed radiation protection manager designated health physicist. During this call, the NRC Staff requested additional information related to the planned duties for this position. The requested information is attached as Exhibit D.

Exhibit A contains the proposed change which adds a paragraph to Bases page 25b. This supplement does not change the intent of our original submittal, therefore the May 4, 2000 Safety Evaluation, Determination of No Significant Hazards Consideration, and

¹ On August 7, 2000, operating authority for the Monticello plant was transferred from Northern States Power Company (NSP) to the Nuclear Management Company (NMC).

ADD 1

Environmental Assessment remain valid. Exhibit B contains current Technical Specification page 25b marked up with the proposed change. Exhibit C contains revised Monticello Technical Specification page 25b.

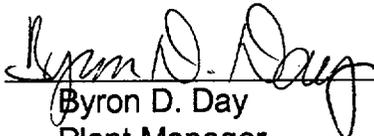
This submittal does not modify any prior commitments but does contain the following new NRC commitment:

Plant Radiation Protection Procedures will be revised to describe the duties of the designated health physicist.

Please contact Sam Shirey, Sr. Licensing Engineer, at (763) 295-1449 if you require additional information related to this request. This letter contains no restricted or other defense information.

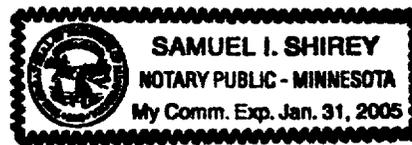
NMC requests approval of the attached amendment prior to the next Monticello refueling outage, currently scheduled for October 2001. We also request a period of up to 30 days following receipt of this license amendment to implement the changes.

To the best of my knowledge, information, and belief, the statements made in this document are true and correct.

by 
Byron D. Day
Plant Manager
Monticello Nuclear Generating Plant

Signed before me on this 5th day of October, 2000 by Byron D. Day, Plant Manager, Monticello Nuclear Generating Plant, and being first duly sworn acknowledged that he is authorized to execute this document on behalf of the Nuclear Management Company (NMC).


Notary



c: Regional Administrator-III, NRC
NRR Project Manager, NRC
Sr. Resident Inspector, NRC
Minnesota Department of Commerce
J Silberg, Esq.

- Attachments:
- Exhibit A – Evaluation of Proposed Change to the Monticello Technical Specifications
 - Exhibit B – Current Monticello Technical Specification Pages Marked Up With Proposed Change
 - Exhibit C – Revised Monticello Technical Specification Pages
 - Exhibit D – Duties of Radiation Protection Manager Designated Health Physicist

Exhibit A

Supplement 2 to "License Amendment Request Dated May 4, 2000 Revision to Technical Specification Administrative Controls and Other Miscellaneous Changes"

Evaluation of Proposed Change to the Monticello Technical Specifications

Pursuant to 10 CFR Part 50, Section 50.90, Nuclear Management Company (NMC) hereby proposes the following changes to Appendix A, of facility operating license DPR-22, Technical Specification (TS) and Bases for Monticello Nuclear Generating Plant.

The proposed addition to section 4.0 reads as follows:

- D. *If it is discovered that a surveillance was not performed within the extended time interval allowed by 4.0.B, then the **affected equipment** shall be declared inoperable. [Emphasis added]*
- E. *Compliance with 4.0.D may be delayed, from the time of discovery, up to 24 hours or up to the limit of the time interval, whichever is less. This delay period is permitted to allow performance of the surveillance.*

The current Monticello Technical Specifications are Custom Technical Specifications (CTS). Unlike Standard Technical Specifications (STS), the Monticello CTS have several instances where surveillances requirements (SR) do not have associated LCOs. "Affected equipment" refers to specific equipment on which a SR is being performed. If a piece of equipment fails a SR and there is no corresponding LCO, an operability determination is performed using Generic Letter 91-18. An LCO may or may not be entered, depending on the result of the operability determination.

One example of a SR without a corresponding LCO is the emergency diesel generator (EDG) air starting system. Currently, Monticello TS surveillance requirement 4.9.B.3.b states that:

During the monthly generator test, the diesel starting air compressor shall be checked for operation and their ability to recharge air receivers.

The "affected equipment" in this SR is the air compressor. Even if the air compressor fails the SR and is declared inoperable, the EDG remains operable as long as air pressure remains available in the receiver tanks. However, since there is no associated LCO for the air compressors, the question arises whether the EDG should also be declared inoperable. In this example, the emergency diesel should not be declared inoperable because it is still capable of starting.

Exhibit A

To ensure clarification of this point, the following paragraph is proposed to be added to the Bases for section 4.0:

“Affected equipment” refers to the specific equipment on which a surveillance is being performed. If there is an LCO that corresponds to the specific equipment that has failed the surveillance, then that LCO shall be entered. If there is no corresponding LCO, then the effect of inoperability of the specific equipment that has failed the surveillance shall be evaluated (i.e., by applying the definition of operability) and actions taken as appropriate (e.g., to comply with the technical specifications).

This supplement does not change the intent of our original submittal, therefore the May 4, 2000 Safety Evaluation, Determination of No Significant Hazards Consideration, and Environmental Assessment remain valid.

**Current Monticello Technical Specification Pages Marked Up
With Proposed Change**

This exhibit consists of the current Technical Specification page marked up with the proposed change. The page included in this exhibit is listed below:

Pages

25b

Bases 4.0:

This specification provides that surveillance activities necessary to ensure the Limiting Conditions for Operations are met and will be performed during the periods when the Limiting Conditions for Operation are applicable.

A tolerance for performing surveillance activities beyond the nominal interval is provided to allow operational flexibility because of scheduling and performance considerations. The plant uses a fixed surveillance program that prevents repetitive addition of the allowable 25% extension. Each surveillance test is completed within plus or minus 25% of each scheduled fixed date. Scheduled dates are based on dividing each calendar year into four 13-week "surveillance" quarters consisting of 3 4-week "surveillance" months and one "catch-up" week. This method of scheduling permits certain tests always to be scheduled on certain days of the week.

The specification ensures that surveillance activities associated with a Limiting Condition for Operation have been performed within the specified time interval prior to entry into a plant condition for which the Limiting Condition for Operation is applicable. Under the terms of this specification, for example, during-initial plant startup or following extended plant outage, the surveillance activities must be performed within the stated surveillance interval prior to placing or returning the system or equipment to Operable status.

"Affected equipment" refers to the specific equipment on which a surveillance is being performed. If there is an LCO that corresponds to the specific equipment that has failed the surveillance, then that LCO shall be entered. If there is no corresponding LCO, then the effect of inoperability of the specific equipment that has failed the surveillance shall be evaluated (i.e., by applying the definition of operability) and actions taken as appropriate (e.g., to comply with the technical specifications).

Add



Revised Monticello Technical Specification Page

This exhibit consists of a revised Technical Specification page that incorporates the proposed change. The page included in this exhibit is listed below:

Page

25b

Bases 4.0:

This specification provides that surveillance activities necessary to ensure the Limiting Conditions for Operations are met and will be performed during the periods when the Limiting Conditions for Operation are applicable.

A tolerance for performing surveillance activities beyond the nominal interval is provided to allow operational flexibility because of scheduling and performance considerations. The plant uses a fixed surveillance program that prevents repetitive addition of the allowable 25% extension. Each surveillance test is completed within plus or minus 25% of each scheduled fixed date. Scheduled dates are based on dividing each calendar year into four 13-week "surveillance" quarters consisting of 3 4-week "surveillance" months and one "catch-up" week. This method of scheduling permits certain tests always to be scheduled on certain days of the week.

The specification ensures that surveillance activities associated with a Limiting Condition for Operation have been performed within the specified time interval prior to entry into a plant condition for which the Limiting Condition for Operation is applicable. Under the terms of this specification, for example, during-initial plant startup or following extended plant outage, the surveillance activities must be performed within the stated surveillance interval prior to placing or returning the system or equipment to Operable status.

"Affected equipment" refers to the specific equipment on which a surveillance is being performed. If there is an LCO that corresponds to the specific equipment that has failed the surveillance, then that LCO shall be entered. If there is no corresponding LCO, then the effect of inoperability of the specific equipment that has failed the surveillance shall be evaluated (i.e., by applying the definition of operability) and actions taken as appropriate (e.g., to comply with the technical specifications).

Duties of Radiation Protection Manager Designated Health Physicist

This memo outlines how the Radiation Protection Manager function will be handled under the proposed technical specification when the General Superintendent of Radiological Services (GSRS) does not satisfy the requirements of Regulatory Guide 1.8, Sept, 1975.

Note: The GSRS is the title for the head of the Chemistry and Radiation Protection Group (CRPG). In the proposed technical specification, this title is changing to the industry generic term, Radiation Protection Manager.

The GSRS will perform the managerial duties of the GSRS. The designated health physicist will perform the technical duties of the GSRS that impact the effectiveness of the Radiation Protection Program. These duties are as follows:

- o approve Radiation Protection Procedures (RPPs), including temporary changes
- o approve Periodic reviews of RPPs
- o approve RPGP 1.14 (as this links to NRC Performance Indicator submittals)
- o approve RWPs requiring GSRS approval per R.1.1
- o remain aware of CRPG activities by attending GSRS staff meetings
- o be involved with outage planning by attending site and CRPG outage planning meetings
- o be involved with CRPG budget creation and revision

To ensure the designated health physicist has sufficient access to the Plant Manager, the designated health physicist will be directed to not hesitate to contact the Plant Manager at any time should a concern arise on any matter related to the effectiveness of the Radiation Protection Program.

To ensure the above guidance is formalized, it will be included in a station procedure.