



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

Operated by Nuclear Management
Company LLC

October 11, 2000

10 CFR Part 50
Section 50.55a

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

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

Correction to Request for Relief from Certain ASME Code Requirements for
Containment Inspection Examination Plan

Reference 1 Letter from NSP to US Nuclear Regulatory Commission, "Request for Relief from Certain ASME Code Requirements for Containment Inspection Examination Plan" May 19, 2000

By Reference 1, Northern States Power, now Nuclear Management Company (NMC), submitted a request for review and approval for relief from certain Class MC ISI requirements.

Relief Requests MC-4 and MC-5 make reference to ASME Section III, part NR, paragraph 2110(b)(5). This paragraph reference should be 2110(b). Paragraph 2110(b)(5) does not exist. The purpose of this letter is to forward corrected copies of the affected relief requests. The copies of MC-4 and MC-5 sent with Reference 1 should be replaced in their entirety with the attached copies.

This letter contains no new Nuclear Regulatory Commission commitments.

Please contact Sam Shirey – Senior Licensing Engineer, at (612) 295-1449 if you require further information.

Byron D. Day
Plant Manager
Monticello Nuclear Generating Plant

A047

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

Attachments:

ISI Relief Request No. MC-4
ISI Relief Request No. MC-5

NORTHERN STATES POWER
MONTICELLO

CONTAINMENT INSPECTION
EXAMINATION PLAN

ISI Relief Request MC-4
All Class MC

SYSTEM: Below
Category: N/A

Class: MC
Item: N/A

Systems/Component(S) For Which Relief Is Requested:

All Class MC, Subarticle IWE-2200(g) preservice examination requirements of reapplied painted or coated containments.

Code Requirement(s):

ASME Section XI, 1992 Edition, 1992 Addenda, Subsection IWE-2200(g) requires that when paint or coatings are reapplied, the condition of the new paint or coating shall be documented in the preservice inspection.

Code Requirement From Which Relief Is Requested:

Relief is requested from the requirement to perform a preservice inspection of new paint or coatings.

Basis For Relief:

Paint and coatings are not part of the containment pressure boundary under current Code rules as they are not associated with the pressure containing function of the component (Paragraph NE-2110(b) of ASME Section III). Paint and coatings on the containment pressure boundary were not subject to Code rules when they were originally applied and are not subject to ASME Section XI rules for repair and replacement in accordance with IWA-4111(b)(5). The requirement to perform a preservice inspection when paint or coatings are reapplied was removed in ASME Section XI, 1998 Edition, Subsection IWE. However, degradation of the coating could impact the structural integrity of the containment. The adequacy of coatings is verified following application through inspections performed by the Monticello Nuclear Generating Plant (MNGP) coatings maintenance program.

Recording the condition of reapplied coatings in preservice records does not substantiate containment structural integrity. Should deterioration of coating in the reapplied area occur, the area will require additional evaluation regardless of the

preservice record. Although MNGP has been performing preservice inspections of reapplied coatings as required by IWE, recording condition of the new paint or coatings in the preservice records does not increase the level of quality and safety of containment.

In SECY 96-80 "Issuance of Final Amendment to 10 CFR Section 50.55a to Incorporate by Reference the ASME Boiler and Pressure Vessel Code (ASME Code), Section XI, Division 1, Subsection IWE and Subsection IWL," dated April 17, 1996, response to Comment 3.2 about IWE-2200(g) states, "In the NRC's opinion, this does not mean that a visual examination must be performed with every application of paint or coating. A visual examination of the topcoat to determine the soundness and the condition of the topcoat should be sufficient." This process is accomplished through inspections performed by the MNGP coating maintenance program. The MNGP coating maintenance programs is described in a November 11, 1998, response to Generic Letter 98-04. In this program the condition of the coatings are examined every 18 months for torus interior, waterline and above, along with the vent system and drywell interior. The exterior of the torus is inspected every five years. The torus is drained every five years and the area below the waterline is inspected at that time. General visual examinations required by IWE are performed each period. These periodic examinations will identify evidence of flaking, blistering, peeling, discoloration, or other signs of coating distress indicative of degradation of the coating system.

Relief is requested in accordance with 10 CFR 50.55a(a)(3)(i). The MNGP nuclear coating program currently provides an adequate level of quality and safety.

The requirement to perform a preservice examination when paint or coatings are reapplied has been removed from the 1998 Edition of ASME Section XI.

Alternative Examinations:

Reapplication of paint and coatings on the drywell, vent system and the suppression chamber will be examined in accordance with the MNGP coating maintenance program. Although repairs to paint or coatings are not subject to the repair/replacement rules of ASME Section XI (Inquiry 97-22), repairs to the primary containment boundary, if required, would be conducted in accordance with ASME Section XI Code rules.

Applicable Time Period:

Relief is requested for the first inspection interval of the Containment Inspection Examination Plan for Monticello Nuclear Generating Plant.

ISI Relief Request MC-5
All Class MC

SYSTEM: Below
Category: N/A

Class: MC
Item: N/A

Systems/Component(S) For Which Relief Is Requested:

All Class MC, Subarticle IWE-2500(b) visual examinations per Table IWE-2500-1 of painted or coated containment components prior to removal of paint or coatings.

Code Requirement(s):

ASME Section XI, 1992 Edition, 1992 Addenda, Subsection IWE-2500(b) requires that when paint or coatings are to be removed, the paint or coating shall be visually examined in accordance with Table IWE-2500-1 prior to removal.

Code Requirement From Which Relief Is Requested:

Subarticle IWE-2500(b) requires that when paint or coatings are to be removed, the paint or coatings shall be visually examined in accordance with Table IWE-2500-1 prior to removal.

Basis For Relief:

Paint and coatings are not part of the containment pressure boundary under current Code rules as they are not associated with the pressure containing function of the component (Paragraph NE-2110(b) of ASME Section III). Paint and coatings on the containment pressure boundary were not subject to Code rules when they were originally applied and are not subject to ASME Section XI rules for repair and replacement in accordance with IWA-4111(b)(5). The requirement to perform a visual examination prior to removal of paint or coatings was removed in ASME Section XI, 1998 Edition, Subsection IWE. NSP's experience with performing inspections prior to removal of coatings as required by IWE indicates there is a burden without a compensating increase in quality or safety.

Relief is requested in accordance with 10 CFR 50.55a(a)(3)(i). The MNGP coating maintenance program currently provides an adequate level of quality and safety.

ISI Relief Request MC-5

Alternative Examinations:

The condition of prepared surfaces are inspected prior to application of new paint or coatings as required by the MNGP coating maintenance program. If degradation is identified, additional measures are taken to determine if the containment pressure boundary is affected. Repairs to the primary containment boundary, if required, will be conducted in accordance with ASME Section XI Code rules.

Applicable Time Period:

Relief is requested for the first inspection interval of the Containment Inspection Examination Plan for Monticello Nuclear Generating Plant.