

January 17, 2001

Mr. Michael F. Hammer
Site General Manager
Monticello Nuclear Generating Plant
Nuclear Management Company, LLC
2807 West County Road 75
Monticello, MN 55362-9637

SUBJECT: MONTICELLO NUCLEAR GENERATING PLANT - ACCEPTANCE REVIEW REGARDING LICENSE AMENDMENT REQUEST, "ESTABLISHMENT OF EMERGENCY SERVICE WATER TECHNICAL SPECIFICATION," DATED NOVEMBER 28, 2000 (TAC NO. MB0649)

Dear Mr. Hammer:

On November 28, 2000, Nuclear Management Company, LLC (NMC), submitted a license amendment request to establish technical specifications (TSs) for the emergency service water (ESW) system and to add a general limiting condition for operation (LCO) to provide requirements when a support system included in the TSs is inoperable.

The Nuclear Regulatory Commission (NRC) staff has reviewed your request and concluded that it does not provide technical information in sufficient detail to enable the staff to make an independent assessment regarding the acceptability of the proposal in terms of regulatory requirements and the protection of public health and safety.

Your request states that the proposed changes are modeled after the Standard TSs (STS, NUREG-1433). Monticello has custom TSs, however, and an ESW system that differs from the reference system (STS 3.7.2, "Plant Service Water and Ultimate Heat Sink") used in STS. For example, Monticello's ESW system has one pump per subsystem and the STS reference system has two pumps per subsystem. In its acceptance review, the staff noted some differences between your request and the STS, for which your justification was unclear. For example, the allowed outage time in STS for one inoperable subsystem is 72 hours compared to your request of 7 days. The requirements for residual heat removal, core spray, and control room ventilation were unclear from your submittal, though you stated that long-term cooling for these systems was dependent on ESW. Insertion of the word "daily" in your proposed Surveillance Requirement 4.18.A.2 differs from the reference STS surveillance requirement and made your intentions unclear. Your submittal proposed a general LCO 3.0.A similar to STS LCO 3.0.6; however, it omitted the Safety Function Determination Program, a key element of STS LCO 3.0.6, without justification. Deviations from the STS in your submittal should be justified based on plant-specific design or licensing basis.

Relating proposed changes to the STS is helpful to licensees and the staff, since it provides a reference point for precedent. Simply referencing the STS is insufficient, however, particularly for a plant that is not converted to the STS. Plant-specific justifications for changes from your current TSs are required. In addition, licensees are encouraged to consider the STS specific characteristics of format and content, word usage and definitions, notation conventions, the use of expanded Bases, 3.0 LCOs, and other factors. These are an integral part of STS and should be evaluated for non-STS based TS changes.

The deficiencies in your November 28, 2000, application were discussed with Mr. B. Day, et al. of your staff on January 5, 2001. A mutually agreeable target date of March 1, 2001, was established for your response providing adequate justification for your license amendment request. The staff will begin review of your amendment application when your response is received. Alternatively, you may withdraw your application and submit a new application, with the deficiencies corrected, at any time in the future. If circumstances result in the need to revise the target date or if you decide to withdraw your application and resubmit it in the future, please contact me at (301) 415-1345 at the earliest opportunity.

Sincerely,

/RA/

Carl F. Lyon, Project Manager, Section 1
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-263

cc: See next page

Monticello Nuclear Generating Plant

cc:

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