



UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

April 5, 2001

Mr. James R. Morris
Site Vice President
Monticello Nuclear Generating Plant
Nuclear Management Company, LLC
2807 West County Road 75
Monticello, MN 55362-9637

SUBJECT: MONTICELLO NUCLEAR GENERATING PLANT - ISSUANCE OF AMENDMENT
RE: FIRE PROTECTION TECHNICAL SPECIFICATION CHANGES
(TAC NO. MB0833)

Dear Mr. Morris:

The Commission has issued the enclosed Amendment No. 119 to Facility Operating License No. DPR-22 for the Monticello Nuclear Generating Plant. The amendment consists of changes to the License and Technical Specifications (TSs) in response to your application dated December 13, 2000, as supplemented April 3, 2001.

The amendment changes License Condition 2.C.4 to conform to NRC Generic Letter (GL) 86-10, "Implementation of Fire Protection Requirements." The amendment also relocates the Fire Protection Program (FPP) elements from the TSs to the licensee-controlled FPP, in accordance with GL 86-10 and GL 88-12, "Removal of Fire Protection Requirements from Technical Specifications."

A copy of our related safety evaluation is also enclosed. The Notice of Issuance will be included in the Commission's biweekly *Federal Register* notice.

Sincerely,

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

Docket No. 50-263

Enclosures: 1. Amendment No. 119 to DPR-22
2. Safety Evaluation

cc w/encls: See next page

NRR-058

April 5, 2001

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Monticello Nuclear Generating Plant
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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

NUCLEAR MANAGEMENT COMPANY, LLC

DOCKET NO. 50-263

MONTICELLO NUCLEAR GENERATING PLANT
AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 119
License No. DPR-22

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Nuclear Management Company, LLC (the licensee), dated December 13, 2000, as supplemented April 3, 2001, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.2 of Facility Operating License No. DPR-22 is hereby amended to read as follows:

Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 119 , are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

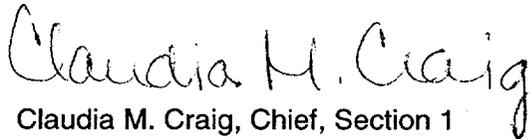
The license is also amended by revising License Condition 2.C.4 to read as follows:

NMC shall implement and maintain in effect all provisions of the approved fire protection program as described in the Updated Safety Analysis Report for the facility and as approved in the SER [safety evaluation report] dated August 29, 1979, and supplements dated February 12, 1981 and October 2, 1985, subject to the following provision:

NMC may make changes to the approved fire protection program without prior approval of the Commission only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.

3. This license amendment is effective as of its date of issuance and shall be implemented within 45 days.

FOR THE NUCLEAR REGULATORY COMMISSION



Claudia M. Craig, Chief, Section 1
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Attachment: Changes to the License and Technical Specifications

Date of Issuance: April 5, 2001

ATTACHMENT TO LICENSE AMENDMENT NO. 119

FACILITY OPERATING LICENSE NO. DPR-22

DOCKET NO. 50-263

Replace the following pages of the Operating License with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

REMOVE

INSERT

4

4

Replace the following pages of the Appendix A Technical Specifications with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

REMOVE

INSERT

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227a

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227b

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227d

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227e

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228a

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4. Fire Protection

NMC shall implement and maintain in effect all provisions of the approved fire protection program as described in the Updated Safety Analysis Report for the facility and as approved in the SER dated August 29, 1979, and supplements dated February 12, 1981 and October 2, 1985, subject to the following provision:

NMC may make changes to the approved fire protection program without prior approval of the Commission only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.

5. Emergency Preparedness Plan

NMC shall follow and maintain in effect emergency plans which meet the standards of 10 CFR 50.47(b) and the requirements in 10 CFR Part 50, Appendix E, including amendments and changes made pursuant to the authority of 10 CFR 50.54(q). The licensee shall meet the requirements of 10 CFR 50.54(s), 50.54(t), and 50.54(u).

6. TMI Action Plan

Northern States Power Company has satisfactorily met all TMI-2 Lessons Learned Category "A" requirements applicable to the facility. Northern States Power Company shall make a timely submittal in response to the letter dated October 31, 1980 regarding post-TMI requirements from Darrell G. Eisenhut, Director, Division of Licensing, Office of Nuclear Reactor Regulation to All Licensees of Operating Plants and Applicants for Operating Licenses and Holders of Construction Permits (NUREG-0737).

7. Repairs to the Recirculation System Piping

The repairs to the recirculation system piping are approved and the unit is hereby authorized to return to power operation, subject to the following condition:

Prior to the startup of Cycle 11, Northern States Power Company shall submit by August 1, 1983 for the Commission's review and approval, a program for inspection and/or modification of the recirculation system piping.

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INTRODUCTION

These Technical Specifications are prepared in accordance with the requirements of 10 CFR 50.36 and apply to the Monticello Nuclear Generating Plant, Unit No. 1. The bases for these Specifications are included for information and understandability purposes.

1.0 DEFINITIONS

The succeeding frequently used terms are explicitly defined so that a uniform interpretation of the Specifications may be achieved.

- A. Alteration of the Reactor Core - The act of moving any component in the region above the core support plate, below the upper grid and within the shroud with the vessel head removed and fuel in the reactor vessel. (Normal operating functions such as control rod movement using the normal drive mechanism, tip scans, SRM and IRM detector movements, etc., are not to be considered core alterations.)
- B. Hot Standby - Hot Standby means operation with the reactor critical in the startup mode at a power level just sufficient to maintain reactor pressure and temperature.
- C. (Deleted)
- D. Immediate - Immediate means that the required action will be initiated as soon as practicable considering the safe operation of the unit and the importance of the required action.
- E. Instrument Functional Test - An instrument functional test means the injection of a simulated signal into the primary sensor to verify proper instrument channel response, alarm, and/or initiating action.

3.0 LIMITING CONDITIONS FOR OPERATION

3.13 ALTERNATE SHUTDOWN SYSTEM

Applicability:

Applies to system controls on the alternate shutdown panel.

Objective:

To insure the integrity of the alternate shutdown system.

Specification:

A. Alternate Shutdown System

1. The system controls on the ASDS panel shall be operable whenever that system/component is required to be operable. 12 RHR Service Water Pump shall be operable from the ASDS panel whenever there is irradiated fuel in the vessel and reactor water temperature is greater than 212°F.
2. If system controls or 12 RHR Service Water Pump required to be operable by Specification 3.13.H.1 are made or found inoperable, restore operability within 7 days, or perform one of the following;
 - a. Provide equivalent shutdown capability and within 60 days restore the inoperable system controls to operable; or
 - b. Establish a continuous fire watch in the cable spreading room and the back-panel area of the control room and within 60 days restore the inoperable system controls to operable; or

4.0 SURVEILLANCE REQUIREMENTS

4.13 ALTERNATE SHUTDOWN SYSTEM

Applicability:

Applies to the periodic testing of controls on the alternate shutdown system panel.

Objective:

To verify the operability of controls on the alternate shutdown panel.

Specification:

A. Alternate Shutdown System

1. Switches on the alternate shutdown system panel shall be functionally tested once per operating cycle.
2. The alternate shutdown system panel master transfer switch shall be verified to alarm in the control room when unlocked once per operating cycle.

3.0 LIMITING CONDITIONS FOR OPERATION

- c. Verify the operability of the fire detectors in the cable spreading room and the back-panel area of the control room and establish a hourly fire watch patrol and within 60 days restore the inoperable system controls to operable; or
 - d. Place the reactor in a condition where the systems for which the system controls at the ASDS are inoperable are not required to be operable within 24 hours.
3. The alternate shutdown system panel master transfer switch shall be locked in the normal position except when in use, being tested or being maintained.

4.0 SURVEILLANCE REQUIREMENTS

Bases 3.13:

The alternate shutdown system panel is provided to assure the capability of achieving cold shutdown, external to the control room, in the unlikely event the control room becomes uninhabitable or safe shutdown equipment in the control room or cable spreading room is damaged by fire. Control of those systems on the alternate shutdown system panel is taken when the locking master transfer switch is moved from the normal to the transfer position and each system's individual transfer switch is put in the transfer mode. When control is established at the alternate shutdown system panel no control of those systems is available from the control room and all automatic initiation signals have been disabled. The master transfer switch shall remain in the locked position at all times when not in use, being tested or being maintained. If the master transfer switch is moved to the transfer position there is an alarm in the control room.

Bases 4.13:

Once per operating cycle the master transfer switch is moved to the transfer mode and it is verified that an alarm in the control room is received, notifying operators that control has been transferred. In addition, once per cycle, each switch is functionally tested to assure that the alternate shutdown system panel is operable and can control those systems contained to perform their design function. A frequency of more than once per operating cycle could adversely impact safety as control is taken from the normal position in the control room and the automatic initiation signals are disabled.

6.0 ADMINISTRATIVE CONTROLS

6.1 Organization

- A. The plant manager shall be responsible for overall unit safe operation and shall have control over those onsite activities necessary for the safe operation and maintenance of the plant. During periods when the plant manager is unavailable, this responsibility may be delegated to other qualified supervisory personnel.

The Shift Supervisor (or, a designated individual during periods of absence from the control room and shift supervisor's office) shall be responsible for the control room command function.

B. Offsite and Onsite Organizations

Onsite and offsite organizations shall be established for plant operation and corporate management, respectively. The onsite and offsite organizations shall include positions for activities affecting plant safety.

1. Lines of authority, responsibility and communication shall be established and defined for the highest management levels through intermediate levels to and including all operating organization positions. These relationships shall be documented and updated, as appropriate, in the form of organization charts, function descriptions of department responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements including the plant-specific titles of those personnel fulfilling the responsibilities of the positions delineated in these Technical Specifications are documented in corporate and plant procedures, or the Updated Safety Analysis Report or the Operational Quality Assurance Plan.
2. A corporate officer with direct responsibility for the plant shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining and providing technical support to the plant to ensure nuclear safety.
3. The individuals who train the operating staff and those who carry out health physics and quality assurance functions may report to the appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their independence from operating pressures.

C. Plant Staff

1. Each on duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.1.1.
 2. At least one licensed operator shall be in the control room when fuel is in the reactor.
 3. At least two licensed operators shall be present in the control room during cold startup, scheduled reactor shutdown, and during recovery from reactor trips.
 4. An individual qualified in radiation protection procedures shall be onsite when fuel is in the reactor.
 5. All alterations of the reactor core shall be directly supervised by a licensed Senior Reactor Operator or Senior Reactor Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation.
 6. The operations manager shall be formerly licensed as a Senior Reactor Operator or hold a current Senior Reactor Operator License.
 7. At least one member of plant management holding a current Senior Reactor Operator License shall be assigned to the plant operations group on a long term basis (approximately two years). This individual will not be assigned to a rotating shift.
- D. Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions, except for (1) the radiation protection manager or designated health physicist who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975, (2) the Shift Technical Advisor who shall have a bachelor's degree or equivalent in a scientific or engineering discipline with specific training in plant design, and response and analysis of the plant for transients and accidents, and (3) the operations manager who shall meet the requirement of ANSI N18.1-1971 except that NRC license requirements are as specified in Specification 6.1.C.7. The training program shall be under the direction of a designated member of Nuclear Management Company, LLC management.

E. (Deleted)

F. Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety-related functions; e.g., senior reactor operators, reactor operators, health physicists, auxiliary operators, and key maintenance personnel. Procedures shall include the following provisions:

1. Adequate shift coverage shall be maintained without routine heavy use of overtime. The objective shall be to have operating personnel work a normal 8 or 12-hour day, nominal 40-hour week while the plant is operating. However, in the event that unforeseen problems require substantial amounts of overtime to be used, or during extended periods of shutdown for refueling, major maintenance or major plant modifications, on a temporary basis, the following guidelines shall be followed:
 - a. An individual should not be permitted to work more than 16 hours straight, excluding shift turnover time.
 - b. Overtime should be limited for all nuclear plant staff personnel so that total work time does not exceed 16 hours in any 24-hour period, nor more than 24 hours in any 48-hour period, not more than 84 hours in any seven day period, all excluding shift turnover time. Individuals should not be required to work more than 15 consecutive days without two consecutive days off.
 - c. A break of at least eight hours including shift turnover time should be allowed between work periods.
 - d. Except during extended shutdown periods, the use of overtime should be considered on an individual basis and not for the entire staff on a shift.



UNITED STATES
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WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 119 TO FACILITY OPERATING LICENSE NO. DPR-22
NUCLEAR MANAGEMENT COMPANY, LLC
MONTICELLO NUCLEAR GENERATING PLANT
DOCKET NO. 50-263

1.0 INTRODUCTION

By application dated December 13, 2000, as supplemented April 3, 2001, the Nuclear Management Company, LLC (the licensee), requested changes to the License and Technical Specifications (TSs) for Monticello Nuclear Generating Plant. The proposed amendment would change License Condition 2.C.4 to conform to NRC Generic Letter (GL) 86-10, "Implementation of Fire Protection Requirements." The proposed amendment would also relocate the Fire Protection Program (FPP) elements from the TSs to the licensee-controlled FPP, in accordance with GL 86-10 and GL 88-12, "Removal of Fire Protection Requirements from Technical Specifications." The April 3, 2001, supplement revised a TS page to reflect changes made by amendments approved subsequent to the December 13, 2000, application. The supplement was within the scope of the original *Federal Register* notice and did not change the staff's initial proposed no significant hazards consideration determination.

2.0 EVALUATION

2.1 Background

Section 182a of the Atomic Energy Act (the "Act") requires applicants for nuclear power plant operating licenses to state TSs to be included as part of the license. The Commission's regulatory requirements related to the content of TSs are set forth in Title 10, *Code of Federal Regulations* (CFR), Section 50.36. The regulation at 10 CFR 50.36 requires that the TSs include items in the following five specific categories: (1) safety limits, limiting safety system settings, and limiting control settings; (2) limiting conditions for operation (LCOs); (3) surveillance requirements (SRs); (4) design features; and (5) administrative controls. However, the regulation does not specify the particular requirements to be included in a plant's TSs.

The Commission has provided guidance for the contents of TSs in its "Final Policy Statement on Technical Specifications Improvements for Nuclear Power Plants" (Final Policy Statement), 58 FR 39132 (July 22, 1993), in which the Commission indicated that compliance with the Final Policy Statement satisfies Section 182a of the Act. In particular, the Commission indicated that certain items could be relocated from the TSs to licensee-controlled documents, consistent with the standard enunciated in Portland General Electric Co. (Trojan Nuclear Plant), ALAB-531, 9 NRC 263, 273 (1979). In that case, the Atomic Safety and Licensing Appeal Board indicated

that "technical specifications are to be reserved for those matters as to which the imposition of rigid conditions or limitations upon reactor operation is deemed necessary to obviate the possibility of an abnormal situation or event giving rise to an immediate threat to the public health and safety." The criteria set forth in the policy statement have been incorporated into 10 CFR 50.36 (60 FR 36953).

Section 50.48, "Fire protection," of 10 CFR Part 50 requires that each operating nuclear power plant have a fire protection plan that satisfies Criterion 3, "Fire protection," of 10 CFR Part 50, Appendix A, General Design Criteria for Nuclear Power Plants. The fire protection plan must describe the overall fire protection program for the facility; outline the plans for fire protection, fire detection, and fire suppression capability; and limitations of fire damage. The program must also describe specific features necessary to implement the program, such as administrative controls and personnel requirements for fire prevention and manual fire suppression activities; automatic and manually operated fire detection and suppression systems; and the means to limit fire damage to structures, systems, or components important to safety so that the capability to safely shut down the plant is ensured. The NRC staff initially approved the Monticello fire protection program in its fire protection safety evaluation report dated August 29, 1979, and supplements dated February 12, 1981, and October 2, 1985.

Following the fire at the Browns Ferry Nuclear Power Plant on March 22, 1975, the NRC undertook a number of actions to ensure that improvements were implemented in the FPPs for all power reactor facilities. Because of the extensive modification of FPPs and the number of open issues resulting from staff evaluations, a number of revisions and alterations occurred in these programs over the years. Consequently, licensees were requested by GL 86-10 to incorporate the final NRC-approved FPP in their Final Safety Analysis Report (FSAR, called the Updated Safety Analysis Report, or USAR, at Monticello). In this manner, the FPP, including the systems, the administrative and technical controls, the organization, and other plant features associated with fire protection, would have a status consistent with that of other plant features described in the FSAR. In addition, the NRC concluded that a standard license condition requiring compliance with the provisions of the FPP as described in the FSAR should be used to ensure uniform enforcement of fire protection requirements. Finally, the NRC stated that with the requested actions, licensees may request an amendment to delete the fire protection TSs that would now be unnecessary. GL 88-12 was issued to provide guidance on removing fire protection requirements from TSs.

GLs 86-10 and 88-12 refer to removing fire protection requirements from the TSs. License amendments that relocate the fire protection requirements in accordance with GLs 86-10 and 88-12 do not revise the requirements for fire protection operability, testing, or inspections. Such amendments simply replace the fire protection TS sections with the standard fire protection license condition. The license condition implements and maintains the NRC-approved fire protection program, including the fire protection requirements previously specified in the TSs, in accordance with 10 CFR 50.48. Therefore, such amendments, including the one proposed by the licensee, are administrative in nature and have no effect on public health and safety.

2.2 Evaluation

GL 86-10 recommended the removal of fire protection requirements from the TSs. Although a comprehensive FPP is essential to plant safety, the basis for this recommendation is that many details of this program that are currently addressed in TSs can be modified without affecting

nuclear safety. Such modifications can be made provided that there are suitable administrative controls over these changes. These details, which are presently included in TSs and are proposed to be removed by this amendment, do not constitute performance requirements necessary to ensure safe operation of the facility and, therefore, do not warrant being included in the TSs. At the same time, suitable administrative controls ensure that there will be careful review and analysis by competent individuals of any changes in the FPP, including those technical and administrative requirements removed from the TSs, to ensure that nuclear safety is not adversely affected. These controls include: (1) the TS administrative controls that are applicable to the FPP and (2) the license condition on implementation of, and subsequent changes to, the FPP.

Monticello TS 6.5.A.6 requires detailed written procedures to implement the FPP. These procedures and changes thereto are required to be reviewed by the Monticello Operations Committee. The Monticello Operational Quality Assurance Plan (OQAP) requires that the Safety Audit Committee review revisions to the FPP. The OQAP requires that the Operations Committee review all procedures required by TSs, which include the implementing procedures of the FPP. The OQAP also requires an annual independent fire protection and loss prevention inspection and audit in addition to normal quality assurance audits, and a triennial independent inspection by an outside qualified fire protection engineer or engineering consultant. Proposed changes to the OQAP are subject to the provisions of 10 CFR 50.54(a).

The specific details relating to fire protection requirements proposed to be removed from TSs by this amendment include those specifications for fire detection systems, fire suppression systems, fire barriers, and fire brigade staffing requirements.

The TS changes proposed by the licensee are in accordance with the guidance of GL 88-12, as addressed below:

- a. The licensee proposes to revise License Condition 2.C.4 to read:

NMC shall implement and maintain in effect all provisions of the approved fire protection program as described in the Updated Safety Analysis Report for the facility and as approved in the SER [safety evaluation report] dated August 29, 1979, and supplements dated February 12, 1981 and October 2, 1985, subject to the following provision:

NMC may make changes to the approved fire protection program without prior approval of the Commission only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.

The proposed license condition references the NRC safety evaluations that approved the Monticello FPP, as described in the USAR. The proposed license condition conforms to the standard license condition requested in GL 86-10 and is acceptable.

- b. The licensee proposes to revise the Table of Contents to reflect removal of the requirements for fire protection and detection systems, subsequent revision of the titles of TS Sections 3.13 and 4.13 to "Alternate Shutdown System," and deletion of Table 3.13.1, "Safety Related Fire Detection Instruments." The proposed changes to the Table of Contents are consistent with the changes to the TSs proposed in the December 13, 2000, application and are acceptable.

- c. The licensee proposes to revise TS Section 1.0.C to delete the definition of Fire Suppression Water System. The proposed change is consistent with the removal of fire protection requirements from the TSs proposed in the December 13, 2000, application. The proposed change is acceptable since the term will no longer appear anywhere in the TSs.
- d. The licensee proposes to revise TS Sections 3.13 and 4.13, "Fire Detection and Protection Systems," titles, applicability, and objectives to be specific to the "Alternate Shutdown System," which is being retained in the TSs. The licensee proposes to delete TS Limiting Conditions for Operation 3.13.A through 3.13.G, Surveillance Requirements 4.13.A through 4.13.G, and Table 3.13.1. The licensee subsequently proposes to renumber TS Section 3.13.H as 3.13.A and TS Section 4.13.H as 4.13.A. The licensee states that the requirements which are to be removed from the TSs will be incorporated into the FPP and implementing procedures. The reporting requirements of TS Sections 3.13.A through 3.13.G will be incorporated into site instructions and revised to require that the special reports be made to the Operations Committee within the current TS-specified time frames. The proposed changes are consistent with the removal of fire protection requirements from the TSs in accordance with the guidance of GLs 86-10 and 88-12 and are acceptable.

The licensee proposes to revise TS Bases Sections 3.13 and 4.13 to reflect the changes above by deleting the paragraphs relating to fire protection requirements. The paragraphs relating to the alternate shutdown system are retained. The staff has no objections to the proposed changes to the Bases.

- e. The licensee proposes to revise TS Section 6.1.B.2 to delete the sentence, "This position has the responsibility for the Fire Protection Program." The responsibility for the FPP is enveloped by the previous sentence in the section which indicates that the corporate officer with direct responsibility for the plant is responsible for overall plant nuclear safety. Therefore, the proposed change is acceptable.
- f. The licensee proposes to delete TS Section 6.1.C.6 and the associated footnote concerning fire brigade manning and renumber Sections 6.1.C.7 and 8 accordingly. The proposed change is consistent with the removal of fire protection requirements from the TSs in accordance with the guidance of GLs 86-10 and 88-12 and is acceptable.
- g. The licensee proposes to delete TS Section 6.1.E concerning fire brigade training. The proposed change is consistent with the removal of fire protection requirements from the TSs in accordance with the guidance of GLs 86-10 and 88-12 and is acceptable.

2.3 Conclusion

Existing and proposed regulatory controls on the Monticello FPP provide reasonable assurance of the continued effectiveness of the program. In addition, adequate procedural controls are in place to ensure that the process for assessing changes to the FPP and its implementing procedures will assign technical reviews to appropriately qualified individuals, as necessary. The following regulatory controls contribute to ensuring the continued effectiveness of the Monticello FPP:

- (1) The licensee proposes a license condition that the licensee may make changes to the approved FPP without Commission approval only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.
- (2) Monticello TS 6.5.A.6 requires detailed written procedures to implement the FPP. These procedures and changes thereto are required to be reviewed by the Operations Committee.
- (3) The Monticello OQAP requires that the Safety Audit Committee review revisions to the FPP. The OQAP requires that the Operations Committee review all procedures required by TSs, which include the implementing procedures of the FPP. The OQAP also requires an annual independent fire protection and loss prevention inspection and audit in addition to normal quality assurance audits, and a triennial independent inspection by an outside qualified fire protection engineer or engineering consultant. Proposed changes to the OQAP are subject to the provisions of 10 CFR 50.54(a).

On the basis of its review of the above items, the staff concludes that the licensee has met the guidance of GL 88-12. Therefore, the proposed changes are acceptable.

3.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Minnesota State official was notified of the proposed issuance of the amendment. The State official had no comments.

4.0 ENVIRONMENTAL CONSIDERATION

The amendment changes administrative requirements, or a requirement with respect to the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20, and changes surveillance requirements. The staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendment involves no significant hazards consideration and there has been no public comment on such finding (66 FR 7684). Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9) and (c)(10). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

5.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: F. Lyon

Date: April 5, 2001