NMC
Committed to Nuclear Excellence

Monticello Nuclear Generating Plant
Operated by Nuclear Management Company, LLC

February 12, 2002

10 CFR Part 50
Section 50.90

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

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

License Amendment Request for
Missed Surveillance Requirement Technical Specification Changes

Attached is a request for a change to the Technical Specifications (TS), Appendix A of Operating License DPR-22, for the Monticello Nuclear Generating Plant. Nuclear Management Company, LLC (NMC) is submitting this request pursuant to and in accordance with the provisions of 10 CFR Part 50, Sections 50.90 and 50.91.

The purpose of this License Amendment Request is to revise the Surveillance Requirement Section of the Technical Specification (TS) to modify the requirements for missed surveillances in Surveillance Requirement (SR) 4.0.E. These changes are consistent with Nuclear Regulatory Commission (NRC) approved Industry/Technical Specification Task Force (TSTF) STS change TSTF-358, Revision 6. The availability of this TS improvement was published in the Federal Register on September 28, 2001, as part of the consolidated line item improvement process (CLIIP). The administrative controls section of the Monticello TS include a TS Bases Control Program (TS 6.8.K) that is consistent with the program described in Section 5.5 of the STS for General Electric Plants, BWR/4.

Exhibit A provides a description of the proposed change, the requested confirmation of applicability, and plant-specific verifications. Exhibit B contains current Monticello Technical Specification and Bases pages marked up with the proposed changes. Exhibit C contains revised Monticello Technical Specification and Bases pages.

The Monticello Operations Committee has reviewed this application. A copy of this submittal, along with the evaluation of No Significant Hazards Consideration Determination, is being forwarded to our appointed state official pursuant to 10 CFR 50.91(b)(1).

NMC requests a period of up to 60 days following receipt of this license amendment to implement the changes.

A001

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Telephone: 763.295.5151 ? Fax: 763.295.1454

Rec'd 03/05/02

NMC requests a period of up to 60 days following receipt of this license amendment to implement the changes.

I declare under penalty of perjury under the laws of the United States of America that I am authorized by NMC to make this request and that the foregoing is true and correct.

If you have any questions regarding this License Amendment Request please contact Doug Neve, Licensing Project Manager (Interim), at (763) 295-1353.

Jeffrey S. Forbes
Vice President
Monticello Nuclear Generating Plant

Subscribed to and sworn before me this 12 day of February 2002.

KATHRYN I. KLEINE
NOTARY PUBLIC - MINNESOTA
My Comm. Exp. Jan. 31, 2005

Kathryn I. Kleine

Notary

Attachments:

	Exhibit A –	Evaluation of Proposed Changes to the Monticello Technical Specifications
	Exhibit B –	Current Monticello Technical Specification and Bases Pages Marked Up With Proposed Changes
	Exhibit C –	Revised Monticello Technical Specification and Bases Pages

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

License Amendment Request for
Missed Surveillance Requirements Technical Specification Changes

Description and Assessment of Proposed Changes

1.0 DESCRIPTION

The proposed amendment would modify Monticello Technical Specifications (TS) requirements for missed surveillances in Surveillance Requirement (SR) 4.0.E.

The changes are consistent with Nuclear Regulatory Commission (NRC) approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specifications (STS) change TSTF-358 Revision 5, as modified by Federal Register Notice 66FR32400, of June 14, 2001, and in response to public comments. The availability of this TS improvement was published in the *Federal Register* on September 28, 2001, as part of the consolidated line item improvement process (CLIIP).

2.0 ASSESSMENT

2.1 Applicability of Published Safety Evaluation

Nuclear Management Company, LLC (NMC) has reviewed the safety evaluation dated September 28, 2001, as part of the CLIIP. This review included a review of the NRC staff's evaluation, as well as the supporting information provided to support TSTF-358. NMC has concluded that the justifications presented in the TSTF proposal and the safety evaluation prepared by the NRC staff are applicable to Monticello and justify this amendment for the incorporation of the changes to the Monticello TS.

2.2 Optional Changes and Variations

NMC is not proposing any variations or deviations from the intent of the TS changes described in the fully modified TSTF-358, Revision 5, or the NRC staff's model safety evaluation dated September 28, 2001, other than the format and wording changes needed to reflect the existing format and wording in the Monticello TS. Monticello TS SR 4.0.E is comparable to the revised portion of STS SR 3.0.3 which is impacted by this change.

3.0 REGULATORY ANALYSIS

3.1 No Significant Hazards Consideration Determination

NMC has reviewed the proposed no significant hazards consideration determination (NSHCD) published in the *Federal Register* as part of the CLIIP. NMC has concluded that the proposed NSHCD presented in the Federal Register notice is applicable to Monticello and is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a).

3.2 Verification and Commitments

As discussed in the notice of availability published in the *Federal Register* on September 28, 2001, for this TS improvement, plant-specific verifications were performed as follows:

NMC has established TS Bases for SR 4.0.E which state that the use of the delay period established by Surveillance Requirement 4.0.E is a flexibility which is not intended to be used as an operational convenience to extend surveillance intervals, but only for the performance of missed surveillances.

The modification will also include changes to the Bases for SR 4.0.E that provide details on how to implement the new requirements. The Bases changes provide guidance for surveillance frequencies that are not based on time intervals but are based on specified unit conditions, operating situations, or requirements of regulations. In addition, the Bases changes state that NMC is expected to perform a missed surveillance test at the first reasonable opportunity, taking into account appropriate considerations, such as the impact on plant risk and accident analysis assumptions, consideration of unit conditions, planning, availability of personnel, and the time required to perform the surveillance. The Bases also state that the risk impact should be managed through the program in place to implement 10 CFR 50.65(a)(4) and its implementation guidance, NRC Regulatory Guide 1.182, "Assessing and Managing Risks Before Maintenance Activities at Nuclear Power Plants," and that the missed surveillance should be treated as an emergent condition, as discussed in Regulatory Guide 1.182. In addition, the Bases state that the degree of depth and rigor of the evaluation should be commensurate with the importance of the component and that missed surveillances for important components should be analyzed quantitatively. The Bases also state that the results of the risk evaluation determine the safest course of action. In addition, the Bases state that all missed surveillances will be placed in the Monticello Corrective Action Program. Finally, NMC has a Bases Control Program consistent with Section 5.5 of the STS.

4.0 ENVIRONMENTAL EVALUATION

NMC has reviewed the environmental evaluation included in the model safety evaluation dated September 28, 2001, as part of the CLIIP. NMC has concluded that the staff's findings presented in that evaluation are applicable to Monticello and the evaluation is hereby incorporated by reference for this application.

License Amendment Request for
Missed Surveillance Requirements Technical Specification Changes

Current Monticello Technical Specification Pages Marked Up
With Proposed Change

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

Pages

25a
25b

4.0 SURVEILLANCE REQUIREMENTS

A. The surveillance requirements of this section shall be met. Each surveillance requirement shall be performed at the specified times except as allowed in B and C below.

B. Specific time intervals between tests may be extended up to 25% of the surveillance interval to accommodate normal test schedules with the exception that, the intervals between tests scheduled for refueling shutdowns shall not exceed two years.

C. Whenever the plant condition is such that a system or component is not required to be operable the surveillance testing associated with that system or component may be discontinued. Discontinued surveillance tests shall be resumed less than one test interval before establishing plant conditions requiring operability of the associated system or component.

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.

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~~ **greater**. This delay period is permitted to allow performance of the surveillance. **A risk evaluation shall be performed for any Surveillance delayed greater than 24 hours and the risk impact shall be managed.**

Bases 4.0:

A. 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.

B. A tolerance for performing surveillance activities beyond the nominal interval is provided to allow operational flexibility because of scheduling and performance considerations. Each surveillance test is completed within plus 25% of each scheduled 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.

C. The specification ensures that surveillance activities associated with a Limiting Condition for Operation **(LCO)** have been performed within the specified time interval prior to entry into a plant condition for which the ~~Limiting Condition for Operation~~ **LCO** 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.

D. "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).

E. The specification establishes the flexibility to defer declaring affected equipment or variables inoperable or outside specified limits when a surveillance has not been completed within schedule. A delay period of up to 24 hours or up to the limit of the specified frequency, whichever is greater, applies from the point in time that it is discovered that the surveillance has not been performed and not from the time that the specified frequency was not met. This delay period permits adequate time for the completion of a surveillance before complying with required LCO specifications or other remedial measures that might preclude completion of the surveillance.

The basis for this delay period includes consideration of unit conditions, adequate planning, availability of personnel, the time required to perform the surveillance, the safety significance of the delay in completing the surveillance, and the recognition that the most probable result of any particular surveillance being performed is the verification of conformance with the requirements.

Bases 4.0:

When a surveillance with a frequency based not on time intervals, but upon specified unit conditions, operating situations, or requirements of regulations (e.g., prior to entering run after each fuel loading, or in accordance with 10 CFR 50, Appendix J, as modified by approved exemptions, etc.) is discovered to not have been performed when specified, the surveillance requirement allows for the full delay period of up to the specified frequency to perform the surveillance. However, since there is not a time interval specified, the missed surveillance should be performed at the first reasonable opportunity.

The surveillance provides a time limit for, and allowances for the performance of, surveillances that become applicable as a consequence of unit condition changes imposed by required LCO's.

Failure to comply with specified frequencies for surveillance requirements is expected to be an infrequent occurrence. Use of the delay period established by the surveillance requirement is a flexibility which is not intended to be used as an operational convenience to extend surveillance intervals. While up to 24 hours or the limit of the specified frequency is provided to perform the missed surveillance, it is expected that the missed surveillance will be performed at the first reasonable opportunity. The determination of the first reasonable opportunity should include consideration of the impact on plant risk (from delaying the surveillance as well as any plant configuration changes required or shutting the plant down to perform the surveillance) and impact on any analysis assumptions, in addition to unit conditions, planning, availability of personnel, and the time required to perform the surveillance. This risk impact should be managed through the program in place to implement 10 CFR 50.65(a)(4) and its implementation guidance (NRC Regulatory Guide 1.182). The missed surveillance should be treated as an emergent condition as discussed in Regulatory Guide 1.182. The risk evaluation may use quantitative, qualitative, or blended methods. The degree of depth and rigor of the evaluation should be commensurate with the importance of the component. Missed surveillances for important components should be analyzed quantitatively. If the results of the risk evaluation determine the risk increase is significant, this evaluation should be used to determine the safest course of action. All missed surveillances will be placed in the Monticello Corrective Action Program.

If a surveillance is not completed within the allowed delay period, then the equipment is considered inoperable or the variable is considered outside the specified limits and the completion times of the required LCO specification

begins immediately upon expiration of the delay period. If a surveillance is failed within the delay period, then the equipment is inoperable, or the variable is outside the specified limits and the completion times of the required LCO specification begins immediately upon the failure of the surveillance.

Completion of the surveillance within the delay period allowed by this specification, or within the completion time of the LCO specifications, restores compliance with the surveillance requirement.

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Revised Monticello Technical Specification Pages

This exhibit consists of revised Technical Specification pages that incorporate the proposed change. The pages included in this exhibit are as listed below:

Pages

25a
25b
25c
25d

4.0 SURVEILLANCE REQUIREMENTS

A. The surveillance requirements of this section shall be met. Each surveillance requirement shall be performed at the specified times except as allowed in B and C below.

B. Specific time intervals between tests may be extended up to 25% of the surveillance interval to accommodate normal test schedules with the exception that, the intervals between tests scheduled for refueling shutdowns shall not exceed two years.

C. Whenever the plant condition is such that a system or component is not required to be operable the surveillance testing associated with that system or component may be discontinued. Discontinued surveillance tests shall be resumed less than one test interval before establishing plant conditions requiring operability of the associated system or component.

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.

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 greater. This delay period is permitted to allow performance of the surveillance. A risk evaluation shall be performed for any Surveillance delayed greater than 24 hours and the risk impact shall be managed.

Bases 4.0:

A. 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.

B. A tolerance for performing surveillance activities beyond the nominal interval is provided to allow operational flexibility because of scheduling and performance considerations. Each surveillance test is completed within plus 25% of each scheduled 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.

C. The specification ensures that surveillance activities associated with a Limiting Condition for Operation (LCO) have been performed within the specified time interval prior to entry into a plant condition for which the LCO 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.

D. "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).

E. The specification establishes the flexibility to defer declaring affected equipment or variables inoperable or outside specified limits when a surveillance has not been completed within schedule. A delay period of up to 24 hours or up to the limit of the specified frequency, whichever is greater, applies from the point in time that it is discovered that the surveillance has not been performed and not from the time that the specified frequency was not met. This delay period permits adequate time for the completion of a surveillance before complying with required LCO specifications or other remedial measures that might preclude completion of the surveillance.

The basis for this delay period includes consideration of unit conditions, adequate planning, availability of personnel, the time required to perform the surveillance, the safety significance of the delay in completing the surveillance, and the recognition that the most probable result of any particular surveillance being performed is the verification of conformance with the requirements.

Bases 4.0 (Continued):

When a surveillance with a frequency based not on time intervals, but upon specified unit conditions, operating situations, or requirements of regulations (e.g., prior to entering run after each fuel loading, or in accordance with 10 CFR 50, Appendix J, as modified by approved exemptions, etc.) is discovered to not have been performed when specified, the surveillance requirement allows for the full delay period of up to the specified frequency to perform the surveillance. However, since there is not a time interval specified, the missed surveillance should be performed at the first reasonable opportunity.

The surveillance provides a time limit for, and allowances for the performance of, surveillances that become applicable as a consequence of unit condition changes imposed by required LCO's.

Failure to comply with specified frequencies for surveillance requirements is expected to be an infrequent occurrence. Use of the delay period established by the surveillance requirement is a flexibility which is not intended to be used as an operational convenience to extend surveillance intervals. While up to 24 hours or the limit of the specified frequency is provided to perform the missed surveillance, it is expected that the missed surveillance will be performed at the first reasonable opportunity. The determination of the first reasonable opportunity should include consideration of the impact on plant risk (from delaying the surveillance as well as any plant configuration changes required or shutting the plant down to perform the surveillance) and impact on any analysis assumptions, in addition to unit conditions, planning, availability of personnel, and the time required to perform the surveillance. This risk impact should be managed through the program in place to implement 10 CFR 50.65(a)(4) and its implementation guidance (NRC Regulatory Guide 1.182). The missed surveillance should be treated as an emergent condition as discussed in Regulatory Guide 1.182. The risk evaluation may use quantitative, qualitative, or blended methods. The degree of depth and rigor of the evaluation should be commensurate with the importance of the component. Missed surveillances for important components should be analyzed quantitatively. If the results of the risk evaluation determine the risk increase is significant, this evaluation should be used to determine the safest course of action. All missed surveillances will be placed in the Monticello Corrective Action Program.

If a surveillance is not completed within the allowed delay period, then the equipment is considered inoperable or the variable is considered outside the specified limits and the completion times of the applicable LCO specification begins immediately upon expiration of the delay period. If a surveillance is failed within the delay period, then the equipment is inoperable, or the variable is outside the specified limits and the completion times of the required LCO specification begins immediately upon the failure of the surveillance.

Bases 4.0 (Continued):

Completion of the surveillance within the delay period allowed by this specification, or within the completion time of the LCO specifications, restores compliance with the surveillance requirement.