

March 27, 2002

Mr. Jeffrey S. Forbes
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 - REQUEST FOR ADDITIONAL
INFORMATION RELATED TO LICENSE AMENDMENT REQUEST
(TAC NO. MB3706)

Dear Mr. Forbes:

By application dated December 21, 2001, Nuclear Management Company, LLC, requested a license amendment to change the Containment Systems section of the Technical Specifications (TSs) to clarify existing requirements, make wording improvements, revise existing limiting conditions for operation (LCOs) and surveillance requirements, and add an additional TS LCO. Based on the staff's review of your application, we request that you provide additional information as discussed in the enclosure to this letter.

The enclosed request was discussed with Mr. D. Neve of your staff on March 19, 2002. A mutually agreeable target date of April 26, 2002, for your response was established. If you need to revise the target date, please contact me at (301) 415-2303, at the earliest opportunity.

Sincerely,

/RA/

Samuel Miranda, Project Manager, Section 1
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-263

Enclosure: Request for Additional Information

cc w/encl: See next page

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Monticello Nuclear Generating Plant

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REQUEST FOR ADDITIONAL INFORMATION

RELATED TO LICENSE AMENDMENT APPLICATION DATED DECEMBER 21, 2001

NUCLEAR MANAGEMENT COMPANY, LLC

MONTICELLO NUCLEAR GENERATING PLANT

DOCKET NO. 50-263

1. Change 2 in your December 21, 2001, submittal deals with clarifying the Action statements in current Technical Specification (CTS) 3.7.A. The change relocates CTS 3.7.A.6 to CTS 3.7.A.1 as proposed Technical Specification (PTS) 3.7.A.1.f; to CTS 3.7.A.3 as PTS 3.7.A.3.c; to CTS 3.7.A.4 as PTS 3.7.A.4.f; and to CTS 3.7.A.5 as PTS 3.7.A.5.d and rewords CTS 3.7.A.6 to specifically apply to CTS 3.7.A.5. The staff finds that the changes associated with CTS 3.7.A.1/PTS 3.7.A.1.f, CTS 3.7.A.3/PTS 3.7.A.3.c and CTS 3.7.A.4/ PTS 3.7.A.4.f are administrative type changes and the justification provided is acceptable. However, the changes associated with CTS 3.7.A.6/CTS 3.7.A.5.d are not administrative changes and have not been adequately justified. CTS 3.7.A.6 requires that if the requirements of CTS 3.7.A.5 are not met, the reactor shall be placed in a Cold Shutdown condition within 24 hours. PTS 3.7.A.5.d requires the reactor to be placed in a Hot Shutdown condition within 12 hours. No justification is provided for this Less Restrictive change of going from Cold Shutdown within 24 hours to Hot Shutdown within 12 hours. In addition, the justification provided for this change states that the change is similar to the requirements in NUREG-1433 "Standard Technical Specifications, General Electric Plants, BWR/4" (STS). Consistency or similarity to the STS is not an adequate justification for a change. Furthermore, the corresponding STS for CTS 3.7.A.5 is STS 3.6.3.3, which requires that the Reactor Thermal Power (RTP) be reduced to less than 15% RTP within 8 hours. **Comment:** Provide additional discussions and justifications for this Less Restrictive change. The discussion should justify the 12-hour Completion Time in the PTS as compared to the 8-hour Completion Time in the STS, as well as the change from Cold Shutdown within 24 hours to Hot Shutdown within 12 hours.

2. CTS 3/4.7.D only applies to primary containment automatic isolation valves and primary system instrument line flow check valves. Change 4 in your December 21, 2001, submittal changes the title from "Primary Containment Automatic Isolation Valves" to "Primary Containment Isolation Valves (PCIVs)" and modifies CTS 3.7.D.2 and CTS 4.7.D.2. The title change and the changes made to CTS 3.7.D.2/PTS 3.7.D.2, CTS 4.7.D.2/PTS 4.7.D.2 and its associated Bases expands the scope of this LCO to include manual valves, normally closed deactivated automatic valves, blind flanges, and check valves that are used for containment isolation. No justification is provided for this aspect of the change. See Comment Numbers 3, 4, 5, 6, 7, and 11 for additional concerns in this area. **Comment:** Provide a discussion and justification for this change. See Comment Numbers 3, 4, 5, 6, 7, and 11.

ENCLOSURE

3. CTS 3.7.D.2 requires that if an automatic PCIV becomes inoperable, “reactor operation in the run mode may continue provided at least one valve in each line having an inoperable valve is closed.” No specific time limit is provided in CTS 3.7.D.2 to close this valve. However, based on CTS 4.7.D.2, it can be assumed the closure of the valve has to be accomplished within 24 hours since closure needs to be recorded daily. In addition, the CTS does not require penetration isolation for an inoperable manual valve, inoperable normally closed deactivated automatic valves, inoperable blind flanges, and inoperable check valves that are used for containment isolation. PTS 3.7.D.2.a specifies that flow paths with one PCIV inoperable be isolated within specific times - 8 hours for MSIVs, 72 hours for excess flow check valves (EFCVs) and 4 hours for all others. No justifications are provided for these More Restrictive (24 hours and no time to 8 or 4 hours) and Less Restrictive (24 hours to 72 hours) changes. See Comment Number 10. **Comment:** Provide additional discussion and justification for these More Restrictive and Less Restrictive changes. See Comment Number 10.
4. CTS 3.7.D.3 requires that a normal orderly shutdown to Cold Shutdown be completed within 24 hours if CTS 3.7.D.1 or 3.7.D.2 cannot be met. If two automatic PCIVs in a flow path become inoperable, CTS 3.7.D.3 must be entered. If two manual valves or two normally closed deactivated automatic valves are inoperable in a flow path, or any combination of automatic and non-automatic PCIVs are inoperable in a flow path, then CTS 3.7.A.2.a.(4) shall be entered. PTS 3.7.D.2.b proposes for two PCIVs inoperable in a flow path, that the flow path be isolated within 1 hour in order to continue reactor operation. No justification is provided for these Less Restrictive (immediate shutdown to isolation within 1 hour and continued operation) and Administrative (CTS 3.7.A.2.a.(4) to PTS 3.7.D.2.b) changes. **Comment:** Provide additional discussion and justification for these Less Restrictive and Administrative changes.
5. CTS 3.7.D.2 requires that if an automatic PCIV becomes inoperable, “reactor operation in the run mode may continue provided at least one valve in each line having an inoperable valve is closed.” The CTS does not specify how this requirement is to be met. PTS 3.7.D.2 clarifies this requirement by changing “...at least one valve...is closed” to “at least one valve...is deactivated in the isolated condition” and defines how this requirement can be satisfied. Two means of satisfying the requirement is with a “blind flange or check valve with the flow through the valve secured.” The CTS based on the wording and structure of CTS 3.7.D.2 and 4.7.D.2 would not allow the use of a blind flange or check valve with flow through the valve secured to be used to isolate a penetration with an inoperable valve. No justification if provided for this Less Restrictive change. See Comment Number 6 for an additional concern in this area. **Comment:** Provide additional discussion and justification for this Less Restrictive change. See Comment Number 6.
6. CTS 3.7.D.2 requires that if an automatic PCIV becomes inoperable, “reactor operation in the run mode may continue provided at least one valve in each line having an inoperable valve is closed.” The CTS does not specify how this requirement is to be met. PTS 3.7.D.2 clarifies this requirement by changing “at least one valve... is closed” to “at least one valve... is deactivated in the isolated condition” and defines how this requirement can be satisfied. One means of satisfying the requirement is with a “check valve with the flow through the valve secured.” While this means of isolating a

penetration is acceptable for penetrations or flow paths with two PCIVs in the flow path and one PCIV inoperable, it is unacceptable for flow paths with two PCIVs in the flow path and two PCIVs inoperable (PTS 3.7.D.2.b) and flow paths with one PCIV in the flow path whether in a closed or non-closed system and an inoperable PCIV (PTS 3.7.D.2.a). As stated in the Bases of STS 3.6.1.3 of NUREG 1433, a check valve may not be used to isolate penetrations for these two situations. **Comment:** Revise PTS 3.7.D.2 to reflect that check valves may not be used to isolate penetrations with two inoperable PCIVs and one inoperable PCIV in systems with one PCIV in the flow path.

7. CTS 4.7.D.2 is performed any time a valve is closed due to an inoperable automatic PCIV. PTS 4.7.D.2 modifies this surveillance to be applicable to any penetration or flow path with a PCIV in the isolated/closed position whether the valve was closed due to CTS 3.7.D.2/PTS 3.7.D.2 or the valve is closed due to its normal operating position. No justification is provided for this More Restrictive change. See Comment Number 8 for an additional concern in this area. **Comment:** Provide additional discussion and justification for this More Restrictive change. See Comment Number 8.
8. PTS 3.7.D.2.a and 3.7.D.2.b are modified by an *note which allows isolated valves closed to satisfy these actions to be reopened on an intermittent basis under Operations Committee approved administrative controls. CTS 3.7.D.2 and CTS 4.7.D.2 do not allow for valve opening on any basis once the valve is closed. No justification is provided for this Less Restrictive change. In addition, PTS 4.7.D.2 specifies that any penetration or flow path with a PCIV in the isolated/closed position whether the valve was closed due to PTS 3.7.D.2 or the valve is closed due to its normal operating position be verified closed at specific frequencies. If a normally closed PCIV is opened for any reason, this could be considered as the valve being inoperable (i.e., not able to perform its safety function). Under these circumstances, entry into PTS 3.7.D.2 would be required. In order to avoid unnecessary entry in PTS 3.7.D.2, the proposed *note should also apply to PTS 4.7.D.2. **Comment:** Provide additional discussion and justification for this Less Restrictive change and revise PTS 4.7.D.2 to include the *note.
9. Change 5 in your submittal of December 21, 2001, relocates CTS 3.7.A.5.c to PTS 3.7.D.3, and rewords the specification to clarify the requirements. While this overall change is acceptable, one aspect of the change has not been justified. The implication of CTS 3.7.A.5.c/PTS 3.7.D.3 is that other than for inerting and de-inerting operations and all other purging and venting operations, the 18-inch purge and vent valves and 2-inch purge and vent valves respectively shall be closed. PTS 4.7.D.2 requires that valves/isolation devices in the closed/isolation position shall be verified on a monthly frequency for valves/isolation devices located outside containment and verified prior to entering Startup or Hot Shutdown from Cold Shutdown, if primary containment was de-inerted while in Cold shutdown and not verified within the previous 92 days. Thus, the 18-inch and 2-inch purge and vent valves would be required to be verified closed on the frequencies specified in PTS 4.7.D.2 unless opened in accordance with PTS 3.7.D.3. NUREG 1433 STS SR 3.6.1.3.2 is the corresponding STS SR for these valves. The frequency specified in the STS for verifying closure of the valves is every 31 days regardless of whether the valve is located inside or outside containment, unless they are open for specific reasons. No justification is provided for

deviating from the STS frequency of 31 days for those purge and vent valves inside containment. **Comment:** Provide a discussion and justification for this deviation from the STS frequency.

10. Change 5 in your submittal of December 21, 2001, relocates CTS 3.7.A.5.c to PTS 3.7.D.3 and rewords the specification to clarify the requirements. While this overall change is acceptable, one aspect of the change may not have been fully considered. If the purge and vent valves are opened for any reason other than inerting and de-inerting operations or purging or venting, CTS 3.7.A.5.c/PTS 3.7.D.3 is violated and the actions of CTS 3.7.A.6 /PTS 3.7.D.4 are entered which requires that Cold Shutdown be reached within 24 hours. Under the same conditions, NUREG 1433, STS 3.6.1.3 would require entry into actions similar to PTS 3.7.D.2 before initiating a shutdown. Since the licensee already has to justify the changed Completion Times for PTS 3.7.D.2 per Comment Number 3, including this change into the proposal should not cause an undue burden and would be advantageous to the licensee. **Comment:** Licensee should consider modifying the proposal to take advantage of this Less Restrictive change, and provide the appropriate discussions and justifications.
11. As stated in Comment Number 2 above, the changes made to CTS 3/4.7.D and its associated Bases have expanded the scope of this specification. However, the changes made in PTS 4.7.D.2 are confusing and seem to contradict the intent of the overall proposed change. PTS 4.7.D.2 is composed of two parts - the surveillance for PCIVs outside containment and the surveillance for PCIVs inside containment. For the portion of the surveillance which deals with PCIVs outside containment, the wording limits the surveillance to valves "deactivated in the isolated position" which by definition in PTS 3.7.D.2 would mean it would only be applicable to closed deactivated automatic valves and closed secured manual valves. Non-secured manual valves, check valves (whether open or closed), and blind flanges outside containment would not be covered by this portion of the surveillance. On the other hand, all PCIVs (whether opened or closed, secured or not secured, active or deactivated) and blind flanges inside containment would have to have their position verified on the specified frequency. The words "isolation devices" in this portion is all inclusive. **Comment:** Correct this discrepancy. See Comment Number 2.