

April 12, 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. MB3042)

Dear Mr. Forbes:

By application dated September 27, 2001, the licensee (Nuclear Management Company) requested amendments to Facility Operating License No. DPR-22, Monticello Nuclear Generating Plant. The amendments proposed changes to the Technical Specifications (TS) Sections 3.9.B.3/4.9.B.3, and an addition of a new section, TS 3.9.B.3.c, regarding emergency diesel generator fuel oil supply volume, starting air receivers and starting air compressors.

To complete its review of the proposed license changes, the staff requests licensee's response to the enclosed questions. After discussing this request with Mr. D. Neve of your staff, a due date of May 17, 2002, has been set. If you need to revise the due 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

April 12, 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. MB3042)

Dear Mr. Forbes:

By application dated September 27, 2001, the licensee (Nuclear Management Company) requested amendments to Facility Operating License No. DPR-22, Monticello Nuclear Generating Plant. The amendments proposed changes to the Technical Specifications (TS) Sections 3.9.B.3/4.9.B.3, and an addition of a new section, TS 3.9.B.3.c, regarding emergency diesel generator fuel oil supply volume, starting air receivers and starting air compressors.

To complete its review of the proposed license changes, the staff requests licensee's response to the enclosed questions. After discussing this request with Mr. D. Neve of your staff, a due date of May 17, 2002, has been set. If you need to revise the due 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

DISTRIBUTION:

PUBLIC OGC
PDIII-1 Reading ACRS
BBurgess, RGN-III RBouling
SMiranda

ACCESSION NO.: ML021010592

OFFICE	PDIII-1/PM	PDIII-1/LA	PDIII-1/SC
NAME	SMiranda	THarris for RBouling	LRaghavan
DATE	04/12/02	04/12/02	04/12/02

OFFICIAL RECORD COPY

Monticello Nuclear Generating Plant

cc:

J. E. Silberg, Esquire
Shaw, Pittman, Potts and Trowbridge
2300 N Street, N. W.
Washington, DC 20037

U.S. Nuclear Regulatory Commission
Resident Inspector's Office
2807 W. County Road 75
Monticello, MN 55362

Site Licensing Manager
Monticello Nuclear Generating Plant
Nuclear Management Company, LLC
2807 West County Road 75
Monticello, MN 55362-9637

Robert Nelson, President
Minnesota Environmental Control
Citizens Association (MECCA)
1051 South McKnight Road
St. Paul, MN 55119

Commissioner
Minnesota Pollution Control Agency
520 Lafayette Road
St. Paul, MN 55155-4194

Regional Administrator, Region III
U.S. Nuclear Regulatory Commission
801 Warrenville Road
Lisle, IL 60532-4351

Commissioner
Minnesota Department of Health
717 Delaware Street, S. E.
Minneapolis, MN 55440

Douglas M. Gruber, Auditor/Treasurer
Wright County Government Center
10 NW Second Street
Buffalo, MN 55313

Commissioner
Minnesota Department of Commerce
121 Seventh Place East
Suite 200
St. Paul, MN 55101-2145

Adonis A. Neblett
Assistant Attorney General
Office of the Attorney General
445 Minnesota Street
Suite 900
St. Paul, MN 55101-2127

Mr. Roy A. Anderson
Executive Vice President and
Chief Nuclear Officer
Nuclear Management Company, LLC
700 First Street
Hudson, WI 54016

Nuclear Asset Manager
Xcel Energy, Inc.
414 Nicollet Mall
Minneapolis, MN 55401

March 2002

REQUEST FOR ADDITIONAL INFORMATION

RELATED TO LICENSE AMENDMENT REQUEST DATED SEPTEMBER 27, 2001

NUCLEAR MANAGEMENT COMPANY, LLC

MONTICELLO NUCLEAR GENERATING PLANT

DOCKET NO. 50-263

1. The proposed new technical specification (TS) 3.9.B.3.c Limiting Condition for Operation (LCO) for standby diesel generators states:
 - c. "When a diesel generator is required to be operable, maintain air pressure for both associated air starting receivers ≥ 165 psig.
 - 1) When a diesel generator starting air receiver pressure < 165 psig, restore starting air receiver pressure to ≥ 165 psig within 7 days, or declare the associated diesel generator inoperable.
 - 2) With both diesel generator starting air receivers pressure < 165 psig, immediately declare the associated diesel generator inoperable."

Standard technical specification (STS)¹ Section LCO 3.8.3.E requires that when one or more diesel generators with starting air receiver pressure < 225 psig and > 125 psig, restore (with completion time of 48 hours) the starting air receiver pressure to ≥ 225 psig.

STS LCO in Section B 3.8.3 states: "The starting air system is required to have a minimum capacity for five successive diesel generator start attempts without recharging the air start receivers."

The technical rationale for the additional requirement is that the change is consistent with NUREG-1433, General Electric Plants, BWR/4, STS. The LCO completion time of 7 days for the proposed TS versus the completion time of 48 hours as specified in the STS is based upon the more robust design (i.e., two redundant air starting systems versus the single air starting system assumed in the applicable STS LCO). However, the proposed TS specifies the minimum air starting pressure rather than the nominal air starting pressure cited in the bases of the STS. Similarly, the associated STS Surveillance Requirement (SR) criteria is based on the nominal air pressure parameter necessary for the minimum number of engine start cycles without recharging the air receiver. Please provide a technical justification for using an off-normal or marginal parameter setting for the proposed LCO and SR instead of the nominal air starting pressure value (i.e., 200 psig).

¹ NUREG-1433, "Standard Technical Specifications (STS) for General Electric Plants, BWR/4" Revision 2.

2. Please address the potential common-cause failure modes which may be possible given that one diesel generator starting air receiver pressure is less than the minimum pressure requirement (i.e., 165 psig) under the proposed LCO TS 3.9.B.3.c and identify any independent means which will verify that the remaining air receiver has sufficient capacity to provide enough air pressure for a minimum of two emergency diesel generator (EDG) starts.
3. Provide detailed calculations to demonstrate that the fuel oil stored in the underground fuel oil storage tank will be sufficient to support the operation of one EDG for 7 days following a loss-of-coolant accident (LOCA). Information should include:
 - a. The methodology² and assumptions used to calculate the fuel oil consumption rates.
 - b. The minimum usable volume of the underground fuel oil storage tank, information should include the assumptions (e.g. instrumentation errors, vortex formation, etc.) used in the calculations and the tank design in detail (including drawings).
4. If the calculations for the EDG fuel oil consumption rates and inventory required are based on the time-dependent loads, the following information should be provided:
 - a. Tables or curves to show the EDG loadings and their corresponding fuel oil consumption rates and inventories as a function of time following the design bases accident.
 - b. Discussion of the provision established in plant procedures for shedding³ the loads following a LOCA, and
 - c. State whether the proposed minimum EDG fuel oil required to be stored in the underground storage tank includes a 10 percent margin as recommended in American National Standards Institute N195-1076.
5. With regard to the licensees' application requests for removing/relocating existing plant TS sections and SR sections, the staff's position is that existing TS sections and SR sections that fall within or satisfy any of the four criteria described in 10 CFR 50.36(c)(2)(ii) must be retained in the TS, while those TS sections and SR sections that do not fall within or satisfy these criteria may be relocated to other licensee's administratively controlled documents, such as plant Technical Requirements Manuals. Please indicate the administratively controlled documents to which the current TS 4.9.B.3.b will be relocated and discuss how the air compressors will be maintained for readiness.

² Calculations based on the assumption that the diesel generator operates continuously for 7 days at its rated capacity or calculations based on the time-dependent loads of the diesel generator.

³ Information provided should clearly indicate which loads will be shed, following a LOCA, and at what times they will be shed.