

September 23, 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. MB4919)

Dear Mr. Forbes:

By application dated April 22, 2002, the Nuclear Management Company, LLC, submitted a license amendment request for a risk-informed technical specification change regarding a one-time 5-year extension of the Type A test interval. While reviewing this request, the Nuclear Regulatory Commission (NRC) staff has determined that it needs additional information in order to complete its review. The NRC staff's request for additional information (RAI) is enclosed.

The enclosed RAI was discussed with Mr. D. Neve of your staff on September 18, 2002. A mutually agreeable target date of October 25, 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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March 2002

REQUEST FOR ADDITIONAL INFORMATION (RAI)
MONTICELLO NUCLEAR GENERATING PLANT
ONE-TIME DEFERRAL OF CONTAINMENT INTEGRATED LEAK RATE TEST (ILRT)
DOCKET NO. 50-263

Reference: April 22, 2002, application from the Nuclear Management Company, LLC (the licensee), "Monticello Nuclear Generating Plant, Licensee Amendment Request for Risk-Informed Technical Specification Change Regarding One Time Five Year Extension of Type A Test Interval"

The inservice inspection requirements of 10 CFR 50.55a and the leak rate testing requirements of Option B of Appendix J complement each other in ensuring the leak-tightness and structural integrity of the containment. The Nuclear Regulatory Commission (NRC) staff requests the following information to complete its review:

Question 1:

On Page A-4 of Exhibit A, under IWE and IWL Inspection Program Activities, the NRC staff understands that the licensee is using the 1992 edition and the 1992 addenda of Subsection IWE. IWE-1240 requires the licensee to identify the surface areas requiring augmented examinations. Please provide the NRC staff with the list of the areas identified for augmented examination and a summary of examinations performed.

Question 2:

On Page A-4 of Exhibit A under IWE and IWL, the licensee considered the first inspection period as 5 years (September 9, 1996 to September 8, 2001) - the period given to licensees to complete their first period examination in 10 CFR 55.55a. In the NRC response to Nuclear Energy Institute (NEI) questions 13, 15, and 16 on containment inservice inspection requirements discussed in the NRC letter to NEI entitled "Response to NEI's Topic and Specific Issues Related to Containment Inspection Requirements," dated May 30, 1997, the NRC staff explained that this interpretation of the rule was incorrect. The NRC staff noted that the inspection periods should be determined as required in the ASME Code, Section XI. Please provide your actual start dates of the first and subsequent inspection periods for ASME Code Class MC components in the first interval, as required by the ASME Code, Section XI.

Question 3:

On Page A-4 under IWE and IWL, the licensee states that "Exceptions taken to the ASME Section XI requirements have been documented and approved by NRC as relief requests." Relief Requests MC-2 and MC-3 for Examination Categories E-D and E-G were authorized by NRC letter dated October 4, 2000. As an alternative, the licensee planned to examine these components during leak rate testing of the primary containment. With the flexibility provided in Option B of Appendix J for Type B and Type C testing (as per NEI report 94-01 and Regulatory Guide 1.163, "Performance-Based Containment Leak-Test Program," September 1995), the extension is requested in the April 22, 2002, application for Type A testing. Please provide the schedule for examination and testing of seals, gasket, and bolts that provides assurance of the integrity of the containment pressure boundary.

ENCLOSURE

Question 4:

On Page A-5 of Exhibit A under "Plant Operational Performance," the licensee states, "The primary containment is maintained at a slightly positive pressure during power operation. Primary containment pressure is monitored in the control room." Please provide information related to the maintenance of this positive pressure, such as the average positive pressure maintained, and details of proposed administrative control to monitor containment depressurization activities and trends (e.g., frequency, duration) for indication of changes to containment leakage.

Question 5:

The stainless steel bellows have been found to be susceptible to transgranular stress corrosion cracking, and leakages through them are not readily detectable by Type B testing (see NRC Information Notice 92-20, "Inadequate Local Leak Rate Testing"). The licensee states that "Monticello containment design includes a steel drywell and suppression chamber with interconnecting vent pipes with bellows." If degraded, the bellows could allow the drywell steam and air to bypass the suppression pool during loss-of-coolant accidents and core damage accidents. Please provide information regarding inspection and testing of the bellows at Monticello.

Question 6:

Inspections of some reinforced and steel containments (e.g., North Anna, Brunswick, D.C. Cook, and Oyster Creek) have indicated degradation from the uninspectable (embedded) side of the steel shell and liner of primary containments. The major uninspectable areas of the Mark I containment are the vertical portion of the drywell shell and part of the shell sandwiched between the drywell floor and the basemat. Please discuss what programs are used to monitor their condition. Also, address how potential leakage due to age-related degradation from these uninspectable areas are factored into the risk assessment in support of the requested ILRT interval extension.