November 5, 2002

MEMORANDUM TO: File

FROM: Darl S. Hood, Senior Project Manager, Section 1 ***/RA/***
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulations

SUBJECT: MONTICELLO NUCLEAR GENERATING PLANT - DRAFT REQUEST FOR ADDITIONAL INFORMATION REGARDING PROPOSED TECHNICAL SPECIFICATION CHANGES ON DRYWELL LEAKAGE AND SUMP MONITORING SYSTEM (TAC NO. MB6493)

On October 25, 2002, I sent the attached e-mail and draft request for additional information (RAI) to Mr. D. Neve, Nuclear Management Company, LLC (the licensee), regarding the Monticello Nuclear Generating Plant. The attached RAI relates to the licensee's application dated October 8, 2002, for a license amendment to change the Technical Specifications on drywell leakage and sump monitoring requirements.

On October 28, 2002, Mr. J. Tatum of the Plant Systems Branch and I called Mr. Neve, et al., to discuss the draft RAI. Following a brief summary of the draft RAI, Mr. Neve stated that the RAI was understood and that a written response would be submitted to the NRC on or about November 1, 2002.

Attachment: E-mail w/Draft Request for Additional Information

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NAME	DHood	RBouling	LRaghavan
DATE	11/05/02	10/31/02	11/05/02

OFFICIAL RECORD COPY

From: Darl Hood
To: internet:douglas.neve@nmcco.com
Date: 10/25/02 10:47AM
Subject: Draft Information Request on Monticello Drywell Leak Monitoring Application

Doug
Attached is a draft request for addtional information regarding your 10/8/02 application for amendment to change the Monticello TS for drywell leakage and sump monitoring. Call me at 301-415-3049 so we can arrange to discuss them.

CC: James Tatum; Michelle Hart; Stephen Burton; Theodore Tjader

ATTACHMENT

Mail Envelope Properties
(3DB95987.897 : 17 : 21158)

Subject: Draft Information Request on Monticello Drywell Leak Monitoring Application
Creation Date: 10/25/02 10:47AM
From: Darl Hood

Created By: DSH@nrc.gov

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douglas	Transferred	10/25/02 10:47AM
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RAI_Draft_MB6493.wpd	4951	10/25/02 08:55AM
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Options

Auto Delete:	No
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To Be Delivered:	Immediate
Status Tracking:	Delivered & Opened

DRAFT REQUEST FOR ADDITIONAL INFORMATION
BY THE OFFICE OF NUCLEAR REACTOR REGULATIONS

The NRC staff is reviewing the licensee's letter of October 8, 2002, requesting a license amendment to change the Technical Specifications for the Monticello Nuclear Generating Plant regarding drywell leakage and sump monitoring system requirements. The NRC staff finds that additional information is needed. Comparing the surveillance interval and criteria for the increase in unidentified leakage as discussed in the Standard Technical Specifications (STS, NUREG-1433, Revision 2.1) with the licensee's proposed changes, the NRC staff makes the following observations and requests:

1. Monticello's SR 4.D.1 specifies a 12-hour surveillance interval for monitoring increases in unidentified leakage rate, while the STS specifies a surveillance interval of 8 hours. However, regardless of the surveillance interval, the licensee should be trending the results so that it will have some idea when it is about to exceed the limit and take action as required, even if this action may be required before the next 12-hour surveillance interval. The NRC staff requests that the licensee confirm that this is consistent with it's understanding and intended operating procedures.

2. The licensee's discussion for the proposed change to TS 3.D.5 does not adequately address the situations when either the drywell floor drain sump (DFDS) or drywell equipment drain sump (DEDS) monitoring system is inoperable, with its respective sump not yet at the point of overflowing and registering in the sump with the operable level monitoring system. During this period, the total leakage rate and/or the unidentified leakage rate are/is indeterminate. The NRC staff requests that the licensee address these situations.

3. The licensee's proposed changes to required action completion times represent a mixture of "custom features" from the current Monticello TS and completion times from the STS. This mixture is not consistently applied to all TSs of relevance to reactor coolant system operational leakage. The proposed shutdown actions of TS 3.D.2, 3.D.3, 3.D.4, and 3.D.5 (to "[b]e in Hot Shutdown within the next 12 hours and in Cold Shutdown within the following 24 hours") are based upon the STS. However, no similar change is proposed if the drywell particulate radioactivity monitoring system should be inoperable (i.e., TS 3.D.6.b maintains the Monticello language "Otherwise, initiate an orderly shutdown of the reactor and reduce water temperature to less than 212 F within 24 hours"). The licensee should confirm that this inconsistency is intentional. The licensee should also explain/justify the proposed relaxation in the shutdown requirement.