



March 19, 2003

L-MT-03-017
10 CFR Part 50
Section 50.90

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

MONTICELLO NUCLEAR GENERATING PLANT
DOCKET 50-263
LICENSE NO. DPR-22

**LICENSE AMENDMENT REQUEST FOR TECHNICAL SPECIFICATION
IMPROVEMENT TO ELIMINATE REQUIREMENTS FOR POST ACCIDENT SAMPLING
SYSTEMS USING THE CONSOLIDATED LINE ITEM IMPROVEMENT PROCESS**

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 (MNGP). Nuclear Management Company, LLC (NMC) is submitting this request pursuant to and in accordance with the provisions of 10 CFR Part 50, Section 50.90 and Section 50.91.

The proposed amendment would delete Technical Specification 6.8.C, "Post Accident Sampling," and thereby eliminate the requirements to have and maintain the Post Accident Sampling System at MNGP. The changes are consistent with NRC approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-413, "Elimination of Requirements for a Post Accident Sampling System (PASS)." The availability of this technical specification improvement was announced in the *Federal Register* on March 20, 2002, as part of the consolidated line item improvement process.

Attachment A provides a description of the proposed changes, the requested confirmation of applicability, and plant-specific verifications. Attachment B contains the current Technical Specification page marked up with the proposed changes. Attachment C contains the revised MNGP Technical Specification pages. Attachment D identifies the regulatory commitments made in this submittal.

Nuclear Management Company, LLC requests approval of the proposed License Amendment by December 30, 2003 and a period of up to 60 days following receipt of the approval to implement the changes.

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

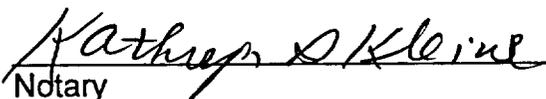
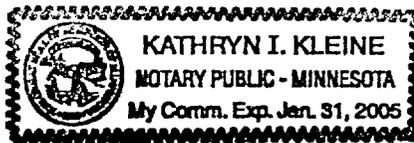
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Please contact John Fields, 763-295-1663, if you require additional information related to this request.



David L. Wilson
Vice President
Monticello Nuclear Generating Plant

Subscribed to and sworn before me this 19th day of March, 2003


Notary

- Attachments: Attachment A – Description and Assessment of Proposed Changes to the Technical Specifications
- Attachment B – Current Technical Specification Pages Marked Up with Proposed Changes
- Attachment C – Revised Technical Specification Pages
- Attachment D – Regulatory Commitments

cc: Regional Administrator-III, NRC
NRR Project Manager, NRC
Resident Inspector, NRC
Minnesota Department of Commerce

Attachment A

Description and Assessment

License Amendment Request

Technical Specification Improvement to Eliminate Requirements for Post Accident Sampling Systems Using the Consolidated Line Item Improvement Process

1. Description

The proposed license amendment deletes the program requirements of Technical Specification 6.8.C, "Post Accident Sampling."

The changes are consistent with Nuclear Regulatory Commission (NRC) approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-413. The availability of this Technical Specification improvement was announced in the Federal Register on March 20, 2002, as part of the consolidated line item improvement process (CLIIP).

2. Assessment

2.1 Applicability of Published Safety Evaluation

NMC has reviewed the safety evaluation published on December 27, 2001 (66 FR 66949) as part of the CLIIP. This verification included a review of the NRC staff's evaluation (as modified slightly by the notice of availability) as well as the supporting information provided to support TSTF-413 (i.e., NEDO-32991, "Regulatory Relaxation for BWR Post Accident Sampling Stations (PASS)," submitted November 30, 2000, and the associated NRC safety evaluation dated June 12, 2001). NMC has concluded that the justifications presented in the TSTF proposal and the safety evaluation prepared by the NRC staff are applicable to MNGP and justify this amendment for incorporation of the changes to the MNGP Technical Specifications.

2.2 Optional Changes and Variations

NMC is not proposing any variations or deviations from the Technical Specification changes described in TSTF-413 or the NRC staff's model safety evaluation published on December 27, 2001.

3. Regulatory Analysis

3.1 No Significant Hazards Determination

Monticello has reviewed the proposed no significant hazards consideration determination published on December 27, 2001 (66 FR 66949) as part of the CLIIP. Monticello has concluded that the proposed determination presented in the notice is

applicable to Monticello and the determination 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 December 27, 2001, for this Technical Specification improvement, plant-specific verifications were performed as follows:

- A. Requirements for installing and maintaining the PASS were included in confirmatory orders for MNGP issued on March 14, 1983 and June 12, 1984 and the NRC Safety Evaluation (SE) dated May 9, 1988. The approval of the proposed license amendment would supersede the requirements for installing and maintaining PASS and associated commitments imposed by these confirmatory orders and the NRC SE.
- B. The NMC is making a regulatory commitment to develop contingency plans for obtaining and analyzing highly radioactive samples from the reactor coolant system, the suppression pool, and the containment atmosphere. The contingency plans will be contained in the plant technical procedures and implementation will be completed within 180 days after the implementation of the License Amendment. Establishment and maintenance of contingency plans is considered a regulatory commitment.
- C. The capability for classifying fuel damage events at the Alert level threshold will be established for the Monticello Nuclear Generating Plant at radioactivity levels of 300 $\mu\text{Ci/gm}$ dose equivalent iodine. This capability will be described in the emergency plan implementing procedures and implementation will be completed within 180 days after the implementation of the License Amendment. The capability for classifying fuel damage events is considered a regulatory commitment.
- D. The NMC has developed an I-131 site survey detection capability for the Monticello Nuclear Generating Plant, including an ability to assess radioactive iodines released to offsite environs by using effluent monitoring systems or portable sampling equipment. The capability for monitoring iodines is maintained within the emergency plan implementing procedures. Implementation of this commitment is complete. The capability to monitor radioactive iodines is considered a regulatory commitment.

4. Environmental Evaluation

The NMC has reviewed the environmental evaluation included in the model safety evaluation published on December 27, 2001 (66 FR 66949) as part of the CLIIP. NMC has concluded that the staff's findings presented in that evaluation are applicable to MNGP and the evaluation is hereby incorporated by reference for this application.

Attachment B

MONTICELLO NUCLEAR GENERATING PLANT

License Amendment Request

Technical Specification Improvement to Eliminate Requirements for Post Accident
Sampling Systems Using the Consolidated Line Item Improvement Process

Current Technical Specification Pages Marked Up with Proposed Changes

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Page

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B. Primary Coolant Sources Outside Containment

This program provides controls to minimize leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to levels as low as practicable. The systems include Core Spray, High Pressure Coolant Injection, Residual Heat Removal, Reactor Core Isolation Cooling, Combustible Gas Control, process sampling, and Standby Gas Treatment. The program shall include the following:

1. Preventive maintenance and periodic visual inspection requirements; and
2. Integrated leak test requirements for each system at refueling cycle intervals or less.

The provisions of Specification 4.0.B are applicable.

A program acceptable to the Commission was described in a letter dated December 31, 1979, from L O Mayer, NSP, to Director of Nuclear Reactor Regulation, "Lessons Learned Implementation."

C. Post Accident Sampling (Deleted)

~~This program provides controls that ensure the capability to obtain and analyze reactor coolant, radioactive gases, and particulates in plant gaseous effluents and containment atmosphere samples under accident conditions. The program shall include the following:~~

- ~~1. Training of personnel;~~
- ~~2. Procedures for sampling and analysis; and~~
- ~~3. Provisions for maintenance of sampling and analysis equipment.~~

Attachment C

MONTICELLO NUCLEAR GENERATING PLANT

License Amendment Request

Technical Specification Improvement to Eliminate Requirements for Post Accident
Sampling Systems Using the Consolidated Line Item Improvement Process

Revised Technical Specification Pages

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Page

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B. Primary Coolant Sources Outside Containment

This program provides controls to minimize leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to levels as low as practicable. The systems include Core Spray, High Pressure Coolant Injection, Residual Heat Removal, Reactor Core Isolation Cooling, Combustible Gas Control, process sampling, and Standby Gas Treatment. The program shall include the following:

1. Preventive maintenance and periodic visual inspection requirements; and
2. Integrated leak test requirements for each system at refueling cycle intervals or less.

The provisions of Specification 4.0.B are applicable.

A program acceptable to the Commission was described in a letter dated December 31, 1979, from L O Mayer, NSP, to Director of Nuclear Reactor Regulation, "Lessons Learned Implementation."

C. (Deleted)

Attachment D

Regulatory Commitments

License Amendment Request

Technical Specification Improvement to Eliminate Requirements for Post Accident Sampling Systems Using the Consolidated Line Item Improvement Process

The following table identifies those actions committed to by the NMC in this document. Any other statements in this submittal are provided for information purposes and are not considered to be regulatory commitments. Please direct questions regarding these commitments to John Fields (763) 295-1663.

Regulatory Commitments	Due Date/Event
The NMC is making a regulatory commitment to develop contingency plans for obtaining and analyzing highly radioactive samples from the reactor coolant system (RCS), the suppression pool, and the containment atmosphere. The contingency plans will be contained in the plant technical procedures and implementation will be completed within 180 days after the implementation of the License Amendment. Establishment and maintenance of contingency plans is considered a regulatory commitment.	To be implemented within 180 days after implementation of the amendment
The capability for classifying fuel damage events at the Alert level threshold will be established for the Monticello Nuclear Generating Plant at radioactivity levels of 300 $\mu\text{Ci/gm}$ dose equivalent iodine. This capability will be described in the emergency plan implementing procedures and implementation will be completed within 180 days after the implementation of the License Amendment. The capability for classifying fuel damage events is considered a regulatory commitment.	To be implemented within 180 days after implementation of the amendment
The NMC has developed an I-131 site survey detection capability for the Monticello Nuclear Generating Plant, including an ability to assess radioactive iodines released to offsite environs by using effluent monitoring systems or portable sampling equipment. The capability for monitoring iodines is maintained within the emergency plan implementing procedures. Implementation of this commitment is complete. The capability to monitor radioactive iodines is considered a regulatory commitment.	Complete