

June 24, 2004

Mr. Thomas J. Palmisano
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 INSERVICE TESTING PROGRAM
RELIEF REQUEST PR-07 (TAC NO. MC1955)

Dear Mr. Palmisano:

The Nuclear Management Company, LLC, letter of February 6, 2004, requested the Nuclear Regulatory Commission (NRC) to grant relief from the fourth 10-year interval of the inservice testing program at the Monticello Nuclear Generating Plant. The NRC staff is reviewing your request and finds that additional information is needed as shown in the enclosed request for additional information (RAI).

I discussed the enclosed RAI with Mr. Doug Neve of your organization on June 23, 2004, and he agreed to respond within 60 days of receipt of the RAI. Please contact me at (301) 415-1423 if you have questions.

Sincerely,

/RA/

L. Mark Padovan, 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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DATE	06/23/04	06/24/04	06/24/04

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Monticello Nuclear Generating Plant
Inservice Testing (IST) Relief Request PR-07
Request for Additional Information (RAI)

Docket No. 50-263

PR-07 requests relief from the American Society of Mechanical Engineers (ASME) Code for Operation and Maintenance of Nuclear Power Plants (OM Code) testing requirements for the emergency filtration train emergency service water (EFT-ESW) system pumps at the Monticello Nuclear Generating Plant. The 1995 edition, 1996 addenda, of the ASME OM Code requires comprehensive flow testing (CPT) every refueling outage at ± 20 percent of the pump design flow. Nuclear Management Company, LLC, (NMC) proposes to perform the CPT at a significantly-lower flow rate. Nuclear Management Company (NMC) is requested to provide the following information:

1. Provide the originally-specified design flow rate and total dynamic head (TDH) for EFT-ESW system pumps. Based on the design flow rate and TDH, describe briefly the criteria used for pump specifications and how the specific EFT-ESW pumps were finally selected. Also, provide the design documents of how the minimum flow requirement is determined for the affected system. It appears that the pump TDH is under-specified while the flow rate is over-specified.
2. Provide the test procedures for the EFT-ESW pumps (specifying the test loop) and acceptance criteria. It appears that the test loop is also the actual flow path for the EFT-ESW system under accident conditions. In order to achieve the highest flow rate, the system resistance cannot be varied during the test. If the system resistance cannot be varied during the test, ASME OM Code ISTB 5.2.3 (c), "Comprehensive Test," requires that the flow rate and pressure be determined and compared to their respective reference values. Discuss whether the requirements of ISTB 5.2.3(c) apply for the EFT-ESW pump test.
3. Provide the system modification cost, including pump replacements, such that CPT can be performed at a flow ± 20 percent of pump design flow, along with any difficulty in making the modifications.
3. Provide the records and history of maintenance and repair work performed on the EFT-ESW pumps from the time NMC installed them in January 2000. Also, explain (including providing the records and history of maintenance and repair work performed on the pumps) why the original EFT-ESW pumps need to be replaced.
4. As shown in the pump performance curves provided by Johnston Pump Company in NMC's submittal of February 6, 2004, the pump design flow is 250 gpm at 174 TDH. In accordance with ASME OM Code ISTB 4.3(e)(1), "Reference Values," reference values must be established within ± 20 percent of pump design flow rate for the comprehensive flow test. Explain why NMC uses ISTB 4.3(e)(2) for Group A or B tests to determine an IST design

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flow rate for CPT. It appears that NMC will continue the existing pump test of 50 percent to 57 percent of the design flow rate. However, by introducing an IST design flow of 200 gpm, the proposed reduced-flow test looks more like a flow test of 63 percent to 72 percent. Because the pump is expected to operate at a significantly-lower design flow rate, can the pump be run reliably for an extended period of time following the accident?

5. Give the details (e.g. temporary modifications of piping) of any EFT-ESW pump full-flow testing performed during preservice or during service since the start of commercial operation. Also, provide any other full-flow data of pump shop testing provided by the manufacturer.
6. The acceptance criteria of Table ISTB 5.2.3-1, "Comprehensive Test Hydraulic Acceptance Criteria," of the ASME OM Code specifies the acceptable, alert, and required action ranges required for CPT at the pump design flow. Justify the acceptability of using these acceptance criteria for pump tests at a lower flow rate. Alternatively, justify how operation at the lower flow confirms the capability of the pump to perform as required under design flow conditions or how it meets the intent of the CPT.

Monticello Nuclear Generating Plant

cc:

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October 2003