

June 30, 2004

L-MT-04-036
10 CFR 50.90

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Monticello Nuclear Generating Plant
Docket 50-263
License No. DPR-22

License Amendment Request To Support 24-Month Fuel Cycles

Reference: 1) NRC Generic Letter 91-04, "Changes in Technical Specifications Surveillance Intervals to Accommodate a 24-Month Fuel Cycle," dated April 2, 1991.

Pursuant to and in accordance with the provisions of 10 CFR 50.90, Nuclear Management Company, LLC (NMC) hereby requests an amendment to Appendix A of Operating License DPR-22 for the Monticello Nuclear Generating Plant. This license amendment request proposes revisions to the Monticello Technical Specifications (TS) and Surveillance Requirements (SR) to support the implementation of 24-month fuel cycles.

This request is intended to implement longer fuel cycles for the Monticello Nuclear Generating Plant during the next operating cycle. This license amendment request supports the 24-month fuel cycle conversion. This request is similar in format and content to the Southern Nuclear Operating Company, Inc. submittal for the Hatch Nuclear Plant, which was reviewed and approved by the NRC through a Safety Evaluation and License Amendment dated July 12, 2002 (Accession No. ML0220400850). This license amendment request demonstrates that the effect of the proposed changes on safety is small.

Enclosure 1 contains a discussion of the methodology used to evaluate the acceptability of the change to a 24-month fuel cycle and compliance with Generic Letter (GL) 91-04. Enclosure 2 contains NMC's Interpretation of the NRC Comments on the EPRI Technical Report 103335, "Guidelines for Instrument Calibration Extension/Reduction Programs." Enclosure 3 contains the Drift Study Cross Reference. Enclosure 4 contains Engineering Standards Manual (ESM)-03.02-APP-III, which is the Monticello specific "Drift Analysis (Instrumentation And Controls)," that was used in the development of this submittal. Enclosure 5 contains the Bases for Change Request for Technical Specifications and Surveillance Requirements Interval Extensions and

Reductions, a Determination of No Significant Hazards Considerations and an Environmental Assessment. Enclosure 6 contains the marked-up Technical Specification pages. Enclosure 7 contains the page change instructions and the revised Technical Specification pages. Enclosure 8 contains the marked-up Technical Specification Bases pages (provided for information only). Enclosure 9 contains the revised Technical Specification Bases pages (also provided for information only).

The Monticello Operations Committee and the Off-Site Review Committee have reviewed this application. A copy of this submittal, along with the Determination of No Significant Hazards Consideration, is being forwarded to our appointed state official pursuant to 10 CFR 50.91(b)(1).

Nuclear Management Company, LLC requests approval of the amendment by March 1, 2005. Once approved the amendment will be implemented within 90 days.

Summary of Commitments

This letter makes the following new commitment:

Monticello will implement a trending program to address setpoints for TS calibration intervals extended to 24 months. Setpoints found to exceed the expected drift for the instruments would require an additional evaluation to ensure the instrument's performance is still enveloped by the assumptions in the drift or setpoint analysis. The trending program will also plot setpoint or transmitter As-Found/As-Left (AFAL) values to verify that the performance of the instruments is within expected boundaries and that adverse trends (repeated directional changes in AFAL even of smaller magnitudes) are detected and evaluated.

If you have any questions regarding this License Amendment Request please contact John Fields, Senior Regulatory Affairs Engineer, at (763) 295-1663.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 4/30/2004



Thomas J. Palmisano
Site Vice President, Monticello Nuclear Generating Plant
Nuclear Management Company, LLC

Enclosures (9)

cc: Administrator, Region III, USNRC
Project Manager, Monticello, USNRC
Resident Inspector, Monticello, USNRC
Minnesota Department of Commerce