January 31, 2005

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 — SECOND REQUEST FOR ADDITIONAL INFORMATION RELATED TO TECHNICAL SPECIFICATIONS CHANGE REQUEST TO IMPLEMENT A 24-MONTH FUEL CYCLE (TAC NO. MC3692)

Dear Mr. Palmisano:

The Nuclear Management Company's, LLC's, letter of June 30, as supplemented November 5, 2004, submitted a license amendment request implement a 24-month fuel cycle at Monticello Nuclear Generating Plant. The Nuclear Regulatory Commission 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. John Fields of your organization on January 28, 2005, and he agreed to respond within 30 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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Monticello Nuclear Generating Plant

License Amendment Request to Support 24-Month Operating Cycles

Second Request for Additional Information

Docket No. 50-263

1. Enclosure 1 to Nuclear Management Company's (NMC's) November 5, 2004, submittal contains sample calculation CA-97-241 where the allowable value is derived from the analytical limit (AL). This is similar to Instrumentation, Systems, and Automation (ISA) Society ANSI/ISA-S67.04-2000, "Setpoints for Nuclear Safety-Related Instrumentation," Method 2, but the uncertainty components are not defined in the calculation. Please confirm that the setpoint methodology used at Monticello is equivalent to ISA Method 2.

2. In sample calculation CA-97-241, Section 6.5 indicates that many analyses assume a trip value of 200 EF, and then NMC uses an AL of 212 EF. If the analyses simply indicate that the value will only reach 200 EF, but corrective action is based upon something else, then this is stated unclearly. If the analyses presume corrective action at 200 EF, then the AL must be 200 EF. Is NMC claiming that the temperature will always rise to 212 EF in a "negligible" amount of time whenever it hits 200 EF, or does this not matter because the device in question is only a "backup" device? Please more explicitly justify these points. In particular, it seems that the analyses either presume action based upon this switch or they do not. It is not clear in this context what it means to say that this is a "backup" device or function.

3. NMC's June 30, 2004, submittal proposes allowing a significant increase in the amount of drift for each component, and extends the time available for random failures to occur. Since the amount of setpoint drift could increase, it would be appropriate to make most setpoints and AVs more conservative. NMC has proposed changing very few setpoints and AVs. Is NMC maintaining that experience shows that drift is far less than assumed in the existing technical specifications (TS), and that the existing TS are overconservative and bound the increased drift? If so, then demonstrate that existing data show that present TS surveillance requirements are usually met. Explain how NMC has extrapolated the 18-month data to justify a 24-month interval considering both random failures and calibration drift. Please provide additional documentation to demonstrate the results of your evaluation that the projected 30-month drift value for these instruments does not exceed the drift allowance provided in the setpoint calculation for these instruments. Please show that the change in channel availability (in regard to equipment failures) is acceptable.

4. Pages 102 and 105 in Enclosure 6 of NMC's June 30, 2004, submittal contain marked-up changes from "Low" reactor water level to "Low-Low" reactor water level. Justify these changes and also provide references to related Updated Safety Analysis Report sections.

5. In the first paragraph on page 9 of 17 in Enclosure 1 of NMC's June 30, 2004, submittal, NMC states "NTSPs [nominal trip setpoints] were changed where it was not possible to accommodate the projected drift by adjusting plant settings . . . ." What plant settings other than setpoint change is NMC referring to?

ENCLOSURE

Monticello Nuclear Generating Plant

cc:

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