January 26, 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 — 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 to 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 11, 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

Request for Additional Information

Docket No. 50-263

1. The following statement appears in your Technical Specifications (TS) Bases on page 69a, "Although the operator will set the setpoints within the trip settings specified in Tables 3.2.1 through 3.2.9, the actual values of the various set points can differ appreciably from the value the operator is attempting to set. ... Therefore, these deviations have been accounted for in the various transient analyses." These statements are then followed by a table of values.

   Explain how this table is currently being used. In your current license amendment you are changing setpoints. However, the amount of deviation in your tables remains the same. Explain why you are not changing these values.

   Licensee Event Reports 2002-02 and 2002-07 address corrective actions associated with the use of this table. Provide the status of these corrective actions.

2. Provide a statement confirming that your proposed setpoints are within analytical safety limits for the following:

   - TS Table 3.2.2, Function A.1.b.ii, "Reactor Low Pressure Permissive Bypass Timer"
   - TS Table 3.2.6, Function 2, "Loss of Voltage Protection"
   - TS Table 3.2.7, "Reactor Coolant System Pressure for Opening/Closing"
   - TS Table 3.2.7, "Discharge Pipe Pressure Inhibit and Position Indication"
   - TS Table 3.2.7, "Inhibit Timers"

3. In your proposed TS changes, you propose to change the language in Surveillance Requirement (SR) 4.5 on page 102, and again on page 105, from "low" reactor water level to "Low Low" reactor water level. In discussing this change, you state that "this is an administrative change required for clarification and to maintain consistency with actual plant practice and other Monticello TSs specifically TS Table 3.2.2, Function B.2." Provide the plant procedures for performing the affected surveillances which demonstrate that this is merely an administrative change.

   At the public meeting between Nuclear Management Company and the Nuclear Regulatory Commission (NRC) on October 12, 2004, you stated that "low" (lowercase "l") is not a defined level and that "Low" and "Low-Low" (uppercase "L") are defined levels. Provide the administrative documentation that describes this convention.

   In your TS Bases on page 64, you have the following two statements:

   - The low reactor water level instrumentation is set to trip when reactor water level is >7" on the instrument.
   - The low low reactor water level instrumentation is set to trip when reactor water level is $ -48".

ENCLOSURE

Neither of these statements reflect your uppercase/lowercase convention as noted previously. The inconsistency is confusing. Describe how you will assure that your plant personnel are aware of the appropriate level ("Low" or "Low Low") despite the lack of total consistency throughout your documentation.

4. In Enclosure 5, pages 41 and 42, for Standby Liquid Control System SR 4.4.A.2.a and SR 4.4.A.2.b, in discussing the basis for which you conclude that the "proposed change on system availability is minimal" you state this "based upon the inherent system and component reliability." Provide the basis from which you determined this inherent reliability. Provide specific examples of test data that supports this conclusion.

5. Refer to Enclosure 5, page 42, for Standby Liquid Control System SR 4.4.B.1. The NRC staff finds your justification for extending this surveillance from 18 to 24 months incomplete as you do not specifically address verifying boron enrichment (i.e. amount of Boron-10). Provide justification as to why the boron enrichment would not be adversely affected as a result of extending this surveillance interval from 18 to 24 months.

6. Refer to Enclosure 5, pages 44 and 45, for emergency core cooling system systems SR 4.5.A.4.a and SR 4.5.A.4.b of your submittal. Explain how "Operating experience shows these components routinely pass the SR when performed at the 18-month interval" by providing the details of your evaluation which describe the basis upon which you draw your conclusion. Also, explain how you conclude that extending the surveillance interval from 18 to 24 months causes a minimal change in system availability. Provide the details from your review of the surveillance history that leads you to this conclusion. Provide specific examples of test data that supports this conclusion.

7. The 1995 edition, 1996 addenda, of the American Society of Mechanical Engineers O&M Code applies to Monticello's Inservice Testing Program Plan. Do you have any restrictions or relief requests that will be affected as a result of going from an 18 to a 24-month fuel cycle? Explain in detail how you address the affected surveillances.

Monticello Nuclear Generating Plant

cc:

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