NMC
Committed to Nuclear Excellence

Monticello Nuclear Generating Plant
Operated by Nuclear Management Company, LLC

July 29, 2005

L-MT-05-074
10 CFR 50.55a

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

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

Request to Use Subsequent Edition and Addenda of ASME Code for Inservice Testing

In accordance with 10 CFR 50.55a(f)(4)(iv), as clarified in NRC Regulatory Issue Summary (RIS) 2004-12, "Clarification on Use of Later Editions and Addenda to the ASME OM Code and Section XI," Nuclear Management Company, LLC (NMC) hereby requests Nuclear Regulatory Commission (NRC) approval to use portions of a later edition and addenda of the American Society of Mechanical Engineers (ASME) Code for Operation and Maintenance of Nuclear Power Plants (OM Code) for the Monticello Nuclear Generating Plant (MNGP) Inservice Testing Program in 10 CFR 50.55a(b).

The request is detailed in Enclosure 1.

This letter makes no new commitments or changes any existing commitments.

John T. Conway
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Nuclear Management Company, LLC

Enclosure

cc: Document Control Desk, USNRC
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ENCLOSURE 1

REQUEST TO USE SUBSEQUENT EDITION AND ADDENDA OF ASME CODE FOR INSERVICE TESTING

In accordance with 10 CFR 50.55a(f)(4)(iv), as clarified in NRC Regulatory Issue Summary (RIS) 2004-12, "Clarification on Use of Later Editions and Addenda to the ASME OM Code and Section XI," Nuclear Management Company, LLC (NMC) hereby requests Nuclear Regulatory Commission (NRC) approval to use portions of a later edition and addenda of the American Society of Mechanical Engineers (ASME) Code for Operation and Maintenance of Nuclear Power Plants (OM Code) for the Monticello Nuclear Generating Plant (MNGP) Inservice Testing (IST) Program in 10 CFR 50.55a(b).

1. ASME Code Components Affected

This request affects all active function manual valves in the IST Program at MNGP.

2. Applicable Code Edition and Addenda

The current Code of record for the MNGP IST Program is the 1995 Edition and 1996 Addenda of the ASME OM Code. This Code requires that active function manual valves be exercised on a quarterly testing interval.

3. Proposed Subsequent Code Edition and Addenda (or Portion)

NMC requests approval to use the portions of the 1999 Addenda of the ASME OM Code related to inservice testing of manually operated valves. Federal Register, Volume 67, Number 187, dated September 26, 2002 (67 FR 60520), incorporates by reference the 1997 Addenda, 1998 Edition, 1999 Addenda, and 2000 Addenda of the ASME OM Code for inservice testing programs in 10 CFR 50.55a(b).

Specifically, NMC would apply the requirements of ISTC-3540, "Manual Valves," 1999 Addenda:

> *"ISTC-3540 Manual Valves. Manual valves shall be full-stroke exercised at least once every 5 years, except where adverse conditions may require the valve to be tested more frequently to ensure operational readiness. Any increased testing frequency shall be specified by the owner. The valve shall exhibit the required change of obturator position."*

NMC proposes to apply ISTC-3540 to all active function manual valves in the IST Program at MNGP.

4. Related Requirements

10 CFR 50.55a(f)(4)(iv) states:

> *"Inservice tests of pumps and valves may meet the requirements set forth in subsequent editions and addenda that are incorporated by reference in paragraph (b) of this section, subject to the limitations and modifications listed in paragraph (b) of this section, and subject to Commission approval. Portions of editions or addenda may be used provided that all related requirements of the respective editions or addenda are met."*

Limitations and Modifications:

10 CFR 50.55a(b)(3) incorporates by reference the ASME Code for Operation and Maintenance of Nuclear Power Plants, and includes the 1995 Edition through the 2003 Addenda. Further, in accordance with the limitation imposed by 10 CFR 50.55a(b)(3)(vi), manual valves must be exercised on a 2-year interval rather than the 5-year interval specified in paragraph ISTC-3540 of the 1999 addenda through the latest edition and addenda provided that adverse conditions do not require more frequent testing.

Adverse conditions have not been observed at MNGP such that a test exercise interval of less than two years would be required.

5. Basis for Using Subsequent Code Editions and Addenda

The ASME OM Code through the 2000 Addenda has been incorporated by reference in 10 CFR 50.55a(b)(3) per 67 FR 60520.

6. Duration of Proposed Request

The duration of the proposed request is for the duration of MNGP's fourth inservice testing interval, which is scheduled to end on May 31, 2012.