Monticello Nuclear Generating Plant License Renewal Audit Questions

Audit Ques	tion No	.: 2.1.1-01								
Source:	SSR A	udit Status:	Sufficient per N	RC Autho	: Galletti		MNGP Owner:	Dave Sexton	Discipline:	Mechanical
Question:		According to Se be referenced in	ction 2.1.1 of the l	License Renewal a	Application, NE ures. What ele	I 95-10 Revision 3 was u ements of Revision 4 were	itilized for scopin e used in the sco	g and screening g pping and screenin	uidance. Revision 4 of t g process?	he guideline appears to
Date Rece	ived:	6/22/2005	Potential Submittal on	Potentia Update	LRA	Assoc LRA Section -	2.1.1			
Draft Respo	onse:	As described in guidance. A co and Screening, 2. Final Scopin supplement oth	the Monticello LR, mparison of NEI 9 Revision 4 did not g decisions were r er sources of infor	A, Revision 4 guid 5-10 Revision 3 a change Revision not based on Appe mation used by M	ance was used nd Revision 4 v 3 guidance but ndix F. Appen onticello such a	d for overall structure and vas performed and the m t supplemented it by inclu dix F was only used to st as NRC requirements, the	I formatting of the ajor changes, by uding a new appe tructure the Mont e CLB and indust	e LRA whereas Re document section endix (Appendix F) ticello presentation try experience.	evision 3 was used for sc , are summarized below to provide further guida of Scoping Criterion 2 r	oping and screening
		Specific to Appe	endix F, Monticello	used the addition	al guidance as	follows:				
		 The same Scc (NSR) SSCs dir completion of a For CLB topics 2.1.4.2.2.a). For NSR pipin boundaries simi based on Apper For NSR SSC Scoping Criteric in the same ger 2.1.4.2.2.c). 	ping Criterion 2 su rectly connected to Scoping Criterion s, Appendix F was g systems directly ilar to Appendix F. ndix F (LRA Sectio spatial proximity, i on 2 and for not inc heral area as Scop	bgroupings were o Scoping Criterior 1 function (LRA S only used to help connected to Sco However, the dei n 2.1.4.2.2.b). industry experience cluding the associa- ing Criterion 1 equ	used for preser 1 SSCs, and (ections 2.1.4.2 ensure all appl bing Criterion 1 inition of equiv e contained in ited NSR air lir ipment. Line p	nting Monticello results in (3) NSR SSCs not directl .2.a, b, and c). licable CLB topics were c l piping systems, Montice alent anchor is largely ba Appendix F was used to nes and HVAC ducting. For pressure and exposure di	the LRA. Subg y connected but considered, i.e., r ello used an appr ased on the Mont help support Mo For fluid containir uration considera	roups were establi whose failure due missiles, heavy loa roach of "equivaler ticello CLB as discu nticello's position fing systems, both th ations of Appendix	shed for (1) CLB topics, to spatial proximity could ds, flooding, and high er nt anchors" for defining S ussed in response to RA for including NSR piping he piping and supports w F were not used by Mor	(2) non safety related d prevent satisfactory nergy lines (LRA Section Scoping Criterion 2 VI 2.1.4.2.2-02 and is not hangers in scope for vere included in scope if nticello (LRA Section
		Summary of NE	I 95-10, Revision	4 Changes by Sec	tion:					
		 Included additi Added discuss Added referen Expanded discuss Added a discussion Added Scoping 	ional guidance on sion on Interim Sta ce to NUREG-180 cussion on LRA up ission on appeals j g Criterion 2 guida	standard compon ff Guidance, 10, 1801, and NRC date process, orocess, and ince in a new appe	ent types and fo inspection pro endix.	unctions, ocedures,				

Sorted by Status, NRC Reviewer/Auditor, and RAI/Question Number

More specifically, by section, changes included:

Table of Contents, Title page, Headers//Changed to be consistent with NEI template.

1.0 Introduction//No major changes.

1.1 Background//No major changes.

1.2 Purpose and Scope//No major changes.

1.3 Applicability//No major changes.

1.4 Utilization of NUREG 1800, NUREG 1801, Regulatory Guide 1.188 and NRC Interim Staff Guidance Documents//Information about NUREG 1800, NUREG 1801, Regulatory Guide 1.188 and Interim Staff Guidance (ISG) process was added.

1.5 Resolution of Current Safety Issues//Made minor edits to bring into line with NUREG-1800 Appendix A.3.

- 1.6 Organization of the Guideline//Added reference to Section 7 and Appendix D.
- 2.0 Overview of Part 54//No major changes.

3.0 Identify The SSCs Within The Scope Of License Renewal and Their Intended Functions//Pointers to NUREG 1800 were added.

3.1 Systems, Structures, and Components Within the Scope of License Renewal//Pointers to NUREG 1800, ISGs and new Appendix F were added.

3.2 Intended Functions of SSCs Within the Scope of License Renewal//Proposed changes to NUREG-1800 for sub components and consumables were added.

3.3 Documenting The Scoping Process//Pointer to NRC Inspection Procedure 71002, License Renewal Inspection, was added. Also added discussion of boundary drawings to accompany LRA.

4.0 Integrated Plant Assessment//Discussion of aging effects identification and AMP identification was added as a brief introduction to follow-on subsections.

4.1 Identification of Structures and Components Subject to an Aging Management Review and Intended Functions//Standardized discussions of SSCs, SCs and intended functions. Evaluation boundary discussion was removed. Complex Assemblies discussion was added. Component intended function table was updated.

4.2 Identification of Aging Effects Requiring Aging Management//Significant revision to incorporate NUREG 1801. Lessons learned were incorporated. Discussion of consistency with NUREG 1801 was added. Use of SLRA Standard Notes was added.

4.3 Demonstrate That the Effects of Aging Are Managed//Significant revision to incorporate NUREG 1801. AMP elements table was added. Discussion of use of NUREG 1801 AMPs, non-NUREG 1801 AMPs and NRC approved non-NUREG 1801 AMPs were added.

4.4 Operating Experience Review//New section. Reference to NUREG 1800 Appendix A.1 was added.

4.5 Documenting the Integrated Plant Assessment//Moved from Section 4.4.

5.0 Time-Limited Aging Analyses Including Exemptions//No major changes.

Sorted by Status, NRC Reviewer/Auditor, and RAI/Question Number

5.1 Time-Limited Aging Analyses//Examples from and links to NUREG 1800 were added. Potential TLAA table was improved based on LRAs.

5.2 Exemptions//No major changes.

5.3 Documenting the Evaluation of the Time-Limited Aging Analyses and Exemptions//No major changes.

6.0 License Renewal Application Format and Content//No major changes.

6.1 General Information//Pointers to NUREG 1800 and NUREG 1801 were added.

6.2 Application Format and Content Guidance//Changed to point to Appendix D. Table updated to current Standard License Renewal Application (SLRA) format, discussion of ISGs added, and more detailed guidance on application format and content included.

6.3 Identify CLB Changes//Moved to 7.1.

7.0 Post License Renewal Application Submittal Activities//New section, introduction added.

7.1 Update of the License Renewal Application for CLB Changes//New section to describe the annual update process.

7.2 License Renewal Application Appeals//New section.

7.3 Post License Renewal Newly Identified SSCs//New section with 10 CFR 54.37(b) process added.

APPENDICES

A 10 CFR Part 54 The License Renewal Rule//No changes.

B Typical Structure, Component and Commodity Groupings And Active/Passive Determinations For The Integrated Plant Assessment//Clarified groupings for fuse holders (#77 & 83)Clarified groupings for housings (# 58, 116, 124, & 125).

C References//References 5 through 15 added.

D Standard License renewal Application Format//New section to include SLRA in a separate appendix.

E Interim Staff Guidance Documents//New section with a summary discussion of each ISG.

F Guidance on Revised 54.4(a)(2) Scoping Criteria//New section to include industry guidance on Scoping Criterion 2.

Final Response: As described in the Monticello LRA, Revision 4 guidance was used for overall structure and formatting of the LRA whereas Revision 3 was used for scoping and screening guidance. A comparison of NEI 95-10 Revision 3 and Revision 4 was performed and the major changes, by document section, are summarized below. Relative to Scoping and Screening, Revision 4 did not change Revision 3 guidance but supplemented it by including a new appendix (Appendix F) to provide further guidance on Scoping Criterion 2. Final Scoping decisions were not based on Appendix F. Appendix F was only used to structure the Monticello presentation of Scoping Criterion 2 results and to supplement other sources of information used by Monticello such as NRC requirements, the CLB and industry experience.

Specific to Appendix F, Monticello used the additional guidance as follows:

- The same Scoping Criterion 2 subgroupings were used for presenting Monticello results in the LRA. Subgroups were established for (1) CLB topics, (2) non safety related

Sorted by Status, NRC Reviewer/Auditor, and RAI/Question Number

(NSR) SSCs directly connected to Scoping Criterion 1 SSCs, and (3) NSR SSCs not directly connected but whose failure due to spatial proximity could prevent satisfactory completion of a Scoping Criterion 1 function (LRA Sections 2.1.4.2.2.a, b, and c).

- For CLB topics, Appendix F was only used to help ensure all applicable CLB topics were considered, i.e., missiles, heavy loads, flooding, and high energy lines (LRA Section 2.1.4.2.2.a).

- For NSR piping systems directly connected to Scoping Criterion 1 piping systems, Monticello used an approach of "equivalent anchors" for defining Scoping Criterion 2 boundaries similar to Appendix F. However, the definition of equivalent anchor is largely based on the Monticello CLB as discussed in response to RAI 2.1.4.2.2-02 and is not based on Appendix F (LRA Section 2.1.4.2.2.b).

- For NSR SSC spatial proximity, industry experience contained in Appendix F was used to help support Monticello's position for including NSR piping hangers in scope for Scoping Criterion 2 and for not including the associated NSR air lines and HVAC ducting. For fluid containing systems, both the piping and supports were included in scope if in the same general area as Scoping Criterion 1 equipment. Line pressure and exposure duration considerations of Appendix F were not used by Monticello (LRA Section 2.1.4.2.2.c).

Summary of NEI 95-10, Revision 4 Changes by Section:

- Included additional guidance on standard component types and functions,

- Added discussion on Interim Staff Guidance,
- Added reference to NUREG-1800, 1801, and NRC inspection procedures,
- Expanded discussion on LRA update process,
- Added a discussion on appeals process, and
- Added Scoping Criterion 2 guidance in a new appendix.

More specifically, by section, changes included:

Table of Contents, Title page, Headers//Changed to be consistent with NEI template.

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- 3.0 Identify The SSCs Within The Scope Of License Renewal and Their Intended Functions//Pointers to NUREG 1800 were added.
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Sorted by Status, NRC Reviewer/Auditor, and RAI/Question Number

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- 5.0 Time-Limited Aging Analyses Including Exemptions//No major changes.
- 5.1 Time-Limited Aging Analyses//Examples from and links to NUREG 1800 were added. Potential TLAA table was improved based on LRAs.
- 5.2 Exemptions//No major changes.
- 5.3 Documenting the Evaluation of the Time-Limited Aging Analyses and Exemptions//No major changes.
- 6.0 License Renewal Application Format and Content//No major changes.
- 6.1 General Information//Pointers to NUREG 1800 and NUREG 1801 were added.

6.2 Application Format and Content Guidance//Changed to point to Appendix D. Table updated to current Standard License Renewal Application (SLRA) format, discussion of ISGs added, and more detailed guidance on application format and content included.

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- 7.1 Update of the License Renewal Application for CLB Changes//New section to describe the annual update process.
- 7.2 License Renewal Application Appeals//New section.
- 7.3 Post License Renewal Newly Identified SSCs//New section with 10 CFR 54.37(b) process added.

APPENDICES

A 10 CFR Part 54 The License Renewal Rule//No changes.

Current as of 8/29/2005 4:05:45 PM

Sorted by Status, NRC Reviewer/Auditor, and RAI/Question Number

B Typical Structure, Component and Commodity Groupings And Active/Passive Determinations For The Integrated Plant Assessment//Clarified groupings for fuse holders (#77 & 83)Clarified groupings for housings (# 58, 116, 124, & 125).

C References//References 5 through 15 added.

D Standard License renewal Application Format//New section to include SLRA in a separate appendix.

E Interim Staff Guidance Documents//New section with a summary discussion of each ISG.

F Guidance on Revised 54.4(a)(2) Scoping Criteria//New section to include industry guidance on Scoping Criterion 2.

Audit Question No.: 2.1.4.2.2-01

Source: SSR	Audit Status:	Sufficient per NRC	Author: Gall	etti	MNGP Owner:	Scott Tradup	Discipline:	Civil
Question:	Are the flood pr	otection plates outside v	varehouse #5 includ	ed in the plant tornado an	alysis as a possible mi	ssile?		
Date Received:	6/22/2005	Potential Submittal on	Potential LRA Update Require	Assoc LRA Se	ction - 2.1.4			
Draft Response	Per USAR Sect 650 lbs. Thus t	tion 12.2.1.8, the plant is the steel plates weigh le	designed for two to ss than the 1 ton des	rnado missiles, a 35 foot l sign basis tornado missile	ong utility pole, and a $$	I ton automobile. T	The weight of a 4 x 8 x ½	plate is approximately
	In addition, in 2 plates. These r potential tornad	003, a field walkdown of missiles ranged in size fi to missile population.	the site was perform om small motors to	ned for potential tornado r automobile size. Althoug	nissiles. Almost 7000 h the flood plates were	missiles were cons not explicitly called	idered from the zone that dout, they are considered	it contains the steel d included in the
Final Response	Per USAR Sect 650 lbs. Thus t	tion 12.2.1.8, the plant is the steel plates weigh lea	designed for two to ss than the 1 ton des	rnado missiles, a 35 foot l sign basis tornado missile	ong utility pole, and a $$	I ton automobile. T	The weight of a 4 x 8 x ½	plate is approximately
	In addition, in 2 plates. These r potential tornad	003, a field walkdown of missiles ranged in size fi lo missile population.	the site was perform rom small motors to	ned for potential tornado r automobile size. Althoug	nissiles. Almost 7000 h the flood plates were	missiles were cons not explicitly called	idered from the zone that I out, they are considered	t contains the steel d included in the

Sorted by Status, NRC Reviewer/Auditor, and RAI/Question Number

Audit Question No	o.: 2.1.4.2.2-02						
Source: SSR A	udit Status:	Sufficient per NRC	Author:	Galletti	MNGP Owner:	Scott Tradup	Discipline: Civil
Question:	Define Equivale	ent Anchor.					
	Issue of grouted	d penetrations serving as	anchor conve	rted to forma	I RAI. Transmitted in NRC letter dated	7/20/2005.	
Date Received:	6/22/2005	Potential Submittal on	Potential L Update Re	RA 🗌 quired	Assoc LRA Section - 2.1.4		
Draft Response:	MNGP primarily considered equi	y used existing piping ana ivalent anchors:	lyses to defin	e equivalent a	anchors. In cases where there was no p	iping analysis, i.e. s	ome small bore piping, the following were
	A. A large pieB. A combinaC. Grouted wa	ece of plant equipment ation of restraints/supports all penetrations	s such that a	ninimum of t	two levels of support are provided in eac	h of the three orthog	onal directions.
	These equivale	nt anchors are consistent	with equivale	nt anchors us	sed in the piping analyses.		
Final Response:	This was a VER MNGP primarily considered equi	RBAL question on 6-22-05 y used existing piping ana ivalent anchors:	lyses to defin	e equivalent :	anchors. In cases where there was no p	iping analysis, i.e. so	ome small bore piping, the following were
	A. A large pieB. A combinaC. Grouted wat	ece of plant equipment ation of restraints/supports all penetrations	s such that a	ninimum of t	two levels of support are provided in eac	h of the three orthog	onal directions.

These equivalent anchors are consistent with equivalent anchors used in the piping analyses.

Audit Question No	o.: 2.1.4.2.2 - 03									
Source: SSR A	udit Status:	Sufficient per N	RC	Author:	Galletti		MNGP Owner:	Scott Tradup	Discipline:	Civil
Question:	What is the basis	s for a wall/floor p	enetration	to be an a	anchor?					
Date Received:	6/22/2005	Potential Submittal on		Potential L Update Re	RA 🗌 quired	Assoc LRA Section	- 2.1.4			
Draft Response:	The MNGP pipir the wall/floor per stronger than the loads.	ng analysis specif netration is groute e concrete and pr	ication def ed solid, it i ovides a m	ines an an meets the neans to tra	chor as "engir criteria for an ansfer the forc	neered components de anchor. The grout use ces and moments to th	esigned to limit tra ed to fill the space le surrounding cor	nslation and rotation between the pipe ar icrete. In addition, th	in three orthogonal dire d the surrounding cond e walls/floors are desig	ections". As long as crete is as strong or gned for piping reaction
	Wall/floor penetr accommodate p	ations that are op ipe movements, t	oen or filleo hey are no	d with firep ot designed	roofing or othe I to provide an	er relatively soft materi ny restraint.	ials are not used a	as anchors. The mat	erials to fill these pene	trations are designed to
Final Response:	This was a VER The MNGP pipir the wall/floor per stronger than the loads.	BAL question on ng analysis specif netration is groute e concrete and pr	6-22-05. ication def ed solid, it ovides a m	ines an an meets the neans to tra	chor as "engir criteria for an ansfer the forc	neered components de anchor. The grout use ces and moments to th	esigned to limit tra ed to fill the space le surrounding cor	nslation and rotation between the pipe ar icrete. In addition, th	in three orthogonal dire d the surrounding cond he walls/floors are desig	ections". As long as crete is as strong or gned for piping reaction
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	See response to	RAI 2.1-02 for ba	asis of wal	l/floor grou	ted penetratio	ons as anchors.				

other area.

Audit Question N	o.: 2.1.4.2.2-04								
Source: SSR A	Audit Status:	Sufficient per NRC	Author:	Galletti		MNGP Owner:	Joe Pairitz	Discipline:	Civil
Question:	What is the define	nition of "General Area	if not as listed	in LRA Section	on 2.1.4.2.2 and TR-011	1?			
Date Received:	6/22/2005	Potential Submittal on	Potential L Update Re	RA	Assoc LRA Section	- 2.1.1			
Draft Response:	The LRA define	s "General Area" as fo	lows:						
	"General area is	s defined as being on t	ne same floor of	a building wi	ith no barrier walls betwo	een the fluid or st	team source and th	e Scoping Criterion 1 co	mponent."
	MNGP conserva condenser room other area.	atively included in the an at 911'. Since there a	bove definition re open hatchw	areas that "co vays between	ommunicate" with the ge these two areas, NSR p	eneral area of inte pressurized comp	erest. An example conents in one area	e would be the main turbi a were deemed to affect	ne deck at 951' and the SR equipment in the
Final Response:	The LRA define	s "General Area" as fo	lows:						
	"General area is	s defined as being on t	ne same floor of	a building wi	ith no barrier walls betwo	een the fluid or st	team source and th	e Scoping Criterion 1 co	mponent."
	MNGP conserva	atively included in the an at 911'. Since there a	bove definition are open hatchw	areas that "co ays between	ommunicate" with the ge these two areas, NSR p	eneral area of inte pressurized comp	erest. An example	would be the main turbi were deemed to affect	ne deck at 951' and the SR equipment in the

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Audit Question N	o.: 2.2-01						
Source: SSR A	Audit Status:	Sufficient per NRC	Author: Galletti	MNGP Owner:	Joe Pairitz	Discipline:	Mechanical
Question:	Please provide a	a list of systems that were	placed in License Renewa	al scope based solely on criterion (a)(2)			
Date Received:	6/22/2005	Potential Submittal on	Potential LRA	Assoc LRA Section - 2.2			
Draft Response:	The following sy	stems were placed in Lice	nse Renewal scope based	solely on criterion (a)(2):			
	Chemistry Samp Circulating Wate Fuel Pool Coolir Turbine Genera	bling (CHM) LRA Section 2 er (CWT) LRA Section 2.3 ng and Cleanup (FPC) LRA tor (TGS) LRA Section 2.3	2.3.3.2 3.3 A Section 2.3.3.10 4.4.5				
Final Response:	The following sy	stems were placed in Lice	nse Renewal scope based	d solely on criterion (a)(2):			
	Chemistry Samp Circulating Wate Fuel Pool Coolir Turbine Genera	bling (CHM) LRA Section 2 er (CWT) LRA Section 2.3 ng and Cleanup (FPC) LR tor (TGS) LRA Section 2.3	2.3.3.2 3.3 A Section 2.3.3.10 .4.5				

Audit Question No.: 2.1.5.3-01

Source:	SSR Au	dit Status:	Sufficient per NRC	Author:	Kavanagh	MNGP Owner:	Joe Pairitz	Discipline: Mechanical
Question:		The process for the results of the	the treatment of consum e evaluations of consuma	ables is contain ables document	ned in LRPP : ed?	2-1 and TR-007. However, there are n	o (or very few) disp	ositions of consumables in ALEX. Where are
Date Rece	eived:	6/23/2005	Potential Submittal on	Potential LR Update Req	A 🗌 uired	Assoc LRA Section - 2.1		
Draft Resp	onse:	Section 5.0 of T report contains	R-007 states that the bas a section entitled "Short-	sis for the deter _ived Compone	minations of ents and Cons	consumables will be presented in the resumables." This is the location of the b	espective AMR reponsion asis for the consum	orts. Every mechanical and civil MNGP AMR nable determinations as directed by TR-007.
Final Resp	onse:	Section 5.0 of T report contains	R-007 states that the bas a section entitled "Short-	sis for the deter _ived Compone	minations of ents and Cons	consumables will be presented in the re sumables." This is the location of the b	espective AMR rep asis for the consum	orts. Every mechanical and civil MNGP AMR nable determinations as directed by TR-007.

Assistion: Confirm if we used NEI-95-10 rev 4 and any of the exception the NRC has taken to this documents. Be prepared to discuss. Assoc LRA Section - 2.0 Submittal on Potential LRA Update Required Assoc LRA Section - 2.0 Response: NEI 95-10, Rev 4, was used as supplementary guidance for the format of the LRA. NEI 95-10, Rev 4, was used as supplementary guidance for the format of the LRA. NEI 95-10, Rev 4, was used as supplementary guidance for the format of the LRA. Response: NEI 95-10, Rev 4, was used as supplementary guidance for the format of the LRA. NEI 95-10, Rev 3, was the version used, and referenced, for all other guidance we respect to preparation of the LRA. Response: NEI 95-10, Rev 4, was used as supplementary guidance for the format of the LRA. NEI 95-10, Rev 3, was the version used, and referenced, for all other guidance we respect to preparation of the LRA. See also response to item 2.1.1-01. See also response to item 2.1.1-01.	urce: SSR Au	dit Status:	Sufficient per NRC	Author: Tingen	MNGP Owner:	Dave Musolf	Discipline: Licensing
e Received: 5/18/2005 Potential Submittal on Potential LRA Update Required Assoc LRA Section - 2.0 : Response: NEI 95-10, Rev 4, was used as supplementary guidance for the format of the LRA. NEI 95-10, Rev 3, was the version used, and referenced, for all other guidance were respect to preparation of the LRA. Response: NEI 95-10, Rev 4, was used as supplementary guidance for the format of the LRA. NEI 95-10, Rev 3, was the version used, and referenced, for all other guidance were respect to preparation of the LRA. Response: NEI 95-10, Rev 4, was used as supplementary guidance for the format of the LRA. NEI 95-10, Rev 3, was the version used, and referenced, for all other guidance were respect to preparation of the LRA. See also response to item 2.1.1-01. See also response to item 2.1.1-01.	estion:	Confirm if we us	sed NEI-95-10 rev 4 and a	any of the exception the NRC has take	n to this documents. Be prep	ared to discuss.	
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		See also respor	nse to item 2.1.1-01.				
		See also respor	nse to item 2.1.1-01.				
	t Question No.	2.1.3-01					
t Question No.: 2.1.3-01	UTCO: SSP AU	tit Status.	Sufficient per NRC	Author: tingen	MNGP Owner:	Mary Engen	Discipline: Mechanical

Source: SSR A	udit Status:	Sufficient per NRC	Author: tingen	MNGP Owner:	Marv Engen	Discipline: Mechanical	
Question:	Reviewers would	d like a list of the CHAM	PS special concern codes ar	nd code descriptions that were used as	a basis for input to determine	e components in-scope.	
Date Received:	5/18/2005	Potential Submittal on	Potential LRA	Assoc LRA Section - 2.1.3			
Draft Response:	Codes provided	to audit team.					
Final Response:	Codes provided	to audit team.					

Audit Que	stion No	.: 2.1.4.2	2-01										
Source:	SSR Au	udit S	Status:	Sufficient per	NRC	Author:	Tingen		M	GP Owner:	Dave Musolf	Discipline:	Licensing
Question	:	MNGP v	was alerte	ed to be prepar	red to disc	cuss the follo	wing items	further during the	e scoping and	d screening a	udit:		
		The definition the same design b	inition of le how die basis eve	Safety Related d you disposition nts per the MN	has used on any diff IGP CLB a	I in the MNG ferences. It and how was	P equipmer would be d this inform	ent database (CHA desirable to have a nation used in LR	AMPS) for co available a te scoping.	ding equipme chnical repor	ent and as used in t t or any other engi	the LR rule, are these the neering basis concerning	e same if they are not g what are the MNGP
Date Rece	eived:			Potential Submittal on		Potential L Update Re	RA	Assoc LRA	A Section - 2.	1.4.2.1			
Draft Resp	oonse:	Dave Se	exton has	developed bri	ef positior	n papers. Se	e final resp	ponse section.					
		During tl flooding, (anticipa	he trip we , HELB, e ated oper	e did show the etc. However th ational occurre	reviewers ne reviewe ences). NF	s information ers will also v RC reviewers	in TR-005 (vill need fur indicated F	(IPA) methodolog Irther clarifying info Farley prepared a	gy report) listi formation on a document s	ng the DBEs how other CL imilar to what	and discussion in B events outside of they are looking for	the LRA concerning inter of USAR chapter 14 were or.	nal flooding, external addressed for scoping
Final Resp	oonse:	Scoping	Criterior	n 1 Safety Rela	ted SSCs	::							
		The first fall within	t of the th in the sco	ree criteria in 1 ope of the rule:	0 CFR Pa	art 54 was us	ed by the N	Monticello Nuclea	ar Generating	Plant (MNGF	P) to determine if S	systems, Structures, and	Components (SSCs)
		Safety-re ensure t	elated sy the follow	stems, structur	res, and c	omponents a	re relied up	pon to remain fund	nctional durin	g and followin	g design-basis eve	ents (as defined in 10 CF	R 50.49 (b)(1)) to
		(i) The i	integrity of	of the reactor c	oolant pre	essure bound	ary						
		(ii) The	capabilit	y to shut down	the reacto	or and mainta	ain it in a sa	afe shutdown con	ndition; or				
		(iii) The §50.67(b	capabilit b)(2), or {	ty to prevent or § 100.11 of this	mitigate f chapter,	the conseque as applicable	ences of ac e.	ccidents that could	ld result in po	tential offsite	exposure compara	ble to the guidelines in §	50.34(a)(1),
		This is a regulatic MNGP C	also the N ons and g Current L	IRC definition of guidance docur icense Basis (0	of "safety- nents. CLB) Defii	related" in 10 nition of Safe	CFR 50.2 ty-Related:	2 and 10 CFR 50.4 I:	.49. In recent	years this, or	r very similar wordi	ng, has been included in	several places in NRC
		The des	ign, cons	struction, and li	censing o	f the MNGP	predates th	he above definitior	on of "safety-r	elated."			
		The MN of the inf	GP Q-Lis formatior	and Q-List Ex sources used	xtension v to identify	vere used to y SSCs meet	code items ing Scopin	s as safety-related ng Criterion 1 Safe	d in the MNG fety Related S	P CHAMPS d systems and S	latabase. The MN Structures.	GP CHAMPS database,	in turn, served as one
		SSC fun be consi sources	nctions w idered in (i.e., CH	ere identified u -scope for licer AMPS was not	sing a nur nse renew t the only i	mber of inforn al for MNGP information s	mation sour Design Ba ource used	urces including the asis Events (DBEs d to make Criterior	e CLB. Thes s), regardless on 1 determin	e functions we s of their curre ations).	ere compared to S ent classification in	coping Criterion 1 to ider CHAMPS or supporting	ntify those that should Q-List information
		In additio	on to CH	AMPS, the Mo	nticello Co	olor Coded P	&IDs and c	other controlled dr	drawings were	e used to iden	tify components re	quired to support system	n-level and structure-

Sorted by Status, NRC Reviewer/Auditor, and RAI/Question Number

level functions. These components were included in-scope for license renewal and generally matched information contained in CHAMPS. Where differences were noted they were documented and resolved. Some of these differences resulted in the issuance of an Action Request for further evaluation within the site Corrective Action Program. In addition to the License Renewal Database (LRDB), results of this effort are documented on License Renewal Boundary Drawings for mechanical components.

Scoping Criterion 1 Evaluation Method

A systematic (holistic) approach was implemented to identify and confirm Scoping Criterion 1 systems, structures, and components (SSCs) were properly identified and captured in scope for License Renewal.

Preparation:

The following approach was used to ensure complete identification of SSCs satisfying Scoping Criterion 1:

-Identify system and structure function(s). Major information sources included:

o SAR (with emphasis on Chapter 12 for Class I items, Chapter 14 for accident and transient event analyses, and individual system and structure description and design bases sections),

o Technical Specifications,

o Color Coded (Q-List) P&IDs,

o Classification information in the plant equipment database (CHAMPS),

o Design Bases Documents (unofficial source of functions and safety classification),

o Plant drawings,

o Operations Manuals,

o Maintenance Rule Basis Documents, and

o Docketed correspondence.

· Classify system and structure functions in accordance with 10CFR54.4 definitions. Information sources include those noted previously.

Identify component functions using standard function types. This effort further validated a complete list of system and structure functions was prepared (e.g., for containment isolation components, an associated function of containment isolation was also included at the system level). Information sources include those previously noted.

• Document system, structure, and component level results (with references) in the License Renewal Data Base (LRDB) and System/Structure Scoping and Screening Output Reports.

Review:

In order to further ensure all Scoping Criterion 1 SSCs were properly identified and classified, an independent review by a technical expert was performed. This review used the same information sources available to the scoping report preparers and performed the following additional actions:

· Compared scoping results across all systems and structures (over 100) for consistency,

• Performed numerous key word searches on both the USAR (review of over 5,600 "hits") and electronic docket (review of over 75 individual documents) to confirm all systems and structures had been appropriately identified and evaluated,

· Reviewed select modifications, calculations, and obtained input from site subject matter experts,

· Assisted in the development of some standard conventions for conveying scoping results onto License Renewal Boundary Drawings and reviewed all drawings, and

• Documented results of this review in the form of comments, by signing as reviewer on Revision 0 System/Structure Scoping and Screening Output Reports and license renewal boundary drawings, and by issuing a review report.

The conclusion to this review noted no major issues were identified. A few additional system/structure level functions were added and, in most cases, the associated components were already in License Renewal scope to support other functions. The most significant changes were to include some components for Scoping Criterion 2, not Criterion 1, functions.

Sorted by Status, NRC Reviewer/Auditor, and RAI/Question Number

MNGP Design Basis Events:

As noted in Section 2.1.3.2 of the MNGP License Renewal Application (LRA), DBEs include both design basis accidents and bounding transients evaluated in Chapter 14 of the USAR. Chapter 12 of the USAR includes an evaluation of natural phenomena and external events applicable to MNGP. Further, Chapter 12 identifies those systems and structures as Class I whose failure could cause a significant release of radioactivity or which are vital to safe shutdown of the plant under normal or accident conditions and the removal of decay and sensible heat from the reactor. Class I SSCs are included in scope for License Renewal per 10 CFR 54.4(a)(1).

DBEs are not defined in the MNGP USAR in the same way they are defined in 10 CFR 50.49(b)(ii). For the purposes of equipment qualification in accordance with 10 CFR 50.49, DBEs included those that could create a harsh environment for which the functions of 10 CFR 50.49 were required (i.e., loss of coolant accidents or high energy line breaks). For the purposes of License Renewal, MNGP used the broader definition of the term Design Basis Event from 10 CFR 50.49(b)(ii).

Therefore, safety related SSCs relied upon to perform the functions of 10 CFR 54.4(a)(1) for Design Basis Events are included in License Renewal scope. For MNGP this includes:

· Normal operation (e.g., startup, shutdown, power operation, refueling),

- Anticipated Operational Occurrences (limiting plant transients per USAR Section 14.4):
- o Generator Load Rejection Without Bypass,
- o Loss of Feedwater Heating,
- o Feedwater Controller Failure (maximum demand),
- o Rod Withdrawal Error, and
- o Turbine Trip without Bypass.
- Design Basis Accidents (USAR Section 14.7 and Appendix I):
- o Control Rod Drop,
- o Loss of Coolant Accident (LOCA),
- o Main Steam Line Break (MSLB),
- o Fuel Assembly Loading Accidents,
- o Recirculation Pump Seizure,
- o Refueling Accident, and
- o High Energy Line Breaks outside containment (in addition to the MSLB).
- · External Events, Natural Phenomena, and Internal Events (USAR Section 12.2.1):
- o Live Loads (e.g., roof snow loads),
- o Wind Loads,
- o Flooding (External and Internal),
- o Tornadoes, and
- o Seismic Events.
- · Non-Limiting Plant Transients Contained in the CLB

Source: SSR A	udit Status:	Sufficient per NRC	Author: Ting	jen		MNGP Owner:	Dave Musolf	Discipline:	Licensing
Question:	The definition of the same how d events per the M	f Safety Related has used lid you disposition any It v MNGP CLB and how was	I in the MNGP equ vould be desirable this information us	pment d to have ed in LR	database (CHAMPS) available a technica R scoping.	for coding equipme report or any other	ent and as used in the engineering basis co	e LR rule, are these the oncerning what are the	e same if they are not MNGP design basis
Date Received:	5/18/2005	Potential Submittal on	Potential LRA Update Require	L t	Assoc LRA Section	on - None			
Draft Response:	During the trip flooding, HELB, (anticipated ope	we did show the reviewer etc. However the reviewe arational occurrences). NF	s information in TR ers will also will ne RC reviewers indica	-005 (IP ed furthe ated Far	PA methodology repo er clarifying informati ley prepared a docu	rt) listing the DBEs on on how other CL ment similar to what	and discussion in the B events outside of t t they are looking for.	e LRA concerning inter JSAR chapter 14 were	nal flooding, external addressed for scoping
	See response to	o Audit Item 2.1.4.2-01.							
Final Response:	Addressed to sa	atisfaction of NRC during	Scoping and Scree	ning Au	ıdit.				
	See response to	o Audit Item 2.1.4.2-01.							
Audit Question N	o.: 2.1-03								
Source: SSR A	udit Status:	Sufficient per NRC	Author: ting	en		MNGP Owner:	Marv Engen	Discipline:	Mechanical
Question:	When looking a "Miscellaneous	t section 5 (System Chan Components not used". N	ges) Equipment m IRC reviewer ques	oved to a tioned w	other systems for the what this group of cor	e SSR report for CR nponents was.	D, the NRC reviewer	noted that some comp	oonents were moved to
Date Received:	5/18/2005	Potential	Potential LRA	н	Assoc LRA Section	on - 2.1			

- Draft Response: I explained that this was a place holder to move components out of the system for components evaluated in a separate area or that were duplicates entries, etc. The CRD component moved to "Miscellaneous Components not used" was a Control Panel (C-216), which we explained the control panels were evaluated by Civil via a commodity. Need to be prepared to discuss with the audit team how the place holder systems (Miscellaneous Components not used, JUNK, etc. were used when we provide the audit team an overview of ALEX.
- Final Response: I explained that this was a place holder to move components out of the system for components evaluated in a separate area or that were duplicates entries, etc. The CRD component moved to "Miscellaneous Components not used" was a Control Panel (C-216), which we explained the control panels were evaluated by Civil via a commodity. Need to be prepared to discuss with the audit team how the place holder systems (Miscellaneous Components not used, JUNK, etc. were used when we provide the audit team an overview of ALEX.

Source: SSR A	udit Statu	s: Sufficient per NRC	Author: tingen	MNGP Owner:	Dave Musolf	Discipline: Mechanical
uestion:	During compa section 2.3.3.	rison of CRD SSR to LRA, 4 (CRD system, list of LR dr	it was note that LR-36042 is liste rawings).	ed in the SSR as an applicable bou	Indary drawing for C	RD, but this information is not included in L
ate Received:	5/18/2005	Potential Submittal on	Potential LRA As	soc LRA Section - 2.3.3.4		
aft Response:	Drawing will b	e added in first Annual USA	AR Supplement.			
nal Response:	Drawing will b	e added in first Annual USA	R Supplement.			
udit Question No	o.: 2.3-01					
udit Question No Source: SSR A	o.: 2.3-01 Judit Statu	s: Sufficient per NRC	Author: tingen	MNGP Owner:	Joe Pairitz	Discipline:
udit Question Ne Source: SSR A Question:	o.: 2.3-01 Nudit Statu Reviewers qu be prepared t insulation.	s: Sufficient per NRC estioned how Heat Tracing o discuss this issue further.	Author: tingen was treated with respect to licer Also be prepared to discuss ins	MNGP Owner: nse renewal. I could not immediatel ulation further concerning scope. F	Joe Pairitz y recall the location Reviewers also ques	Discipline: of this information in our TR reports. Need tioned treatment of vessel/drywell system
udit Question No Source: SSR A Ruestion: ate Received:	o.: 2.3-01 Audit Statu Reviewers qu be prepared t insulation. 5/18/2005	s: Sufficient per NRC estioned how Heat Tracing o discuss this issue further. Potential Submittal on	Author: tingen was treated with respect to licer Also be prepared to discuss ins Potential LRA As Update Required	MNGP Owner: nse renewal. I could not immediatel ulation further concerning scope. F soc LRA Section - 2.3	Joe Pairitz y recall the location Reviewers also ques	Discipline: of this information in our TR reports. Need tioned treatment of vessel/drywell system
udit Question No Source: SSR A Ruestion: Pate Received: Paft Response:	o.: 2.3-01 Audit Statu Reviewers qu be prepared t insulation. 5/18/2005 NRC audit tea	s: Sufficient per NRC estioned how Heat Tracing o discuss this issue further. Potential Submittal on	Author: tingen was treated with respect to licer Also be prepared to discuss ins Potential LRA As Update Required	MNGP Owner: nse renewal. I could not immediatel ulation further concerning scope. F ssoc LRA Section - 2.3 LR Mechanical Group members.	Joe Pairitz y recall the location Reviewers also ques	Discipline: of this information in our TR reports. Need tioned treatment of vessel/drywell system

Source: S	SSR Audi	Status:	Sufficient per N	RC	Author:	tingen	l	MNGP Owner:	Madalin O'Brien	Discipline:	Civil
Question:	St ec	aged equipme uipment cred	ent to mitigate CLE lited to mitigate CL	B events B events	such as exte s should be ir	rnal flooding n scope cons	. Need to confirm and b istent with CLB commitn	e prepared to dis nents.	scuss if such equipment is i	n scope. Revie	ewers indicated the
	Co	onverted to fo	rmal RAI. See NR	C letter	dated 7/20/2	005.					
Date Receiv	/ed: 5/	8/2005	Potential Submittal on		Potential LF Update Rec	RA 🗌 quired	Assoc LRA Section -	2.4			
Draft Respor	nse: Se	e response to	o RAI 2.1-01 on sta	aged equ	uipment.						
inal Respor	nse: Se	See response to RAI 2.1-01 on staged equipment.									

Audit Question No	0.: 2.4.15-01	Sufficient per NRC	Author	tingen		MNGP Owner	Scott Tradun	Discinline: Civil		
Question:	During overview While the compo	v of ALEX for reviewers it v onent is identified as 'In L	was noted th R Boundary'	at for system in ALEX, sho	n Reactor Building (RXB), ould confirm that there are	component CSS e not other inapp	STEEL-RXB-EXT, propriate null value	the safety field ('Y' or 'N') was not filled in ALEX.		
Date Received:	5/18/2005	Potential Submittal on	Potential L Update Re	RA	Assoc LRA Section -	2.4.15				
Draft Response:	A review of ALEX was performed to determine if there was a null value for the safety field for other components in the database. The following components had a null safety field:									
	Various subcom	nponents for the CFW, DG	N, HTV, HP	C, CDR and	RAD systems					
	T-EXPANSION-	-LIQ - DGN System								
	V-FU-1 - HTV S	System								
	CSSTEEL-RXB	-EXT - RXB System								
	CRD_GTBASE	- RIT System								
	CSP_TSLEEVE	- RIT System								
	Except for the E	E-25 Subcomponents unde	er the RAD s	ystem, all the	e above components are i	n scope even th	ough the safety fie	eld has a null value.		
Final Response:	A review of ALE field:	X was performed to deter	mine if there	was a null v	alue for the safety field fo	r other compone	ents in the databas	e. The following components had a null safety		
	Various subcom	nponents for the CFW, DG	N, HTV, HP	C, CDR and	RAD systems					
	T-EXPANSION-	-LIQ - DGN System								
	V-FU-1 - HTV S	System								

Sorted by Status, NRC Reviewer/Auditor, and RAI/Question Number

License Rei	iewai Audii	Question	5									
Audit Question No	o.: 2.5.1-1											
Source: SSR A	udit Status:	Sufficient per	NRC Au	uthor: tin	gen		MNGP Own	ner: F	Ron Siepel	Discipline	: Electrical	
Question:	Reviewers aske instrumentation	d if all of the Reg typically screens	Guide 1.97 insout as active, I	strumentati but would h	on was in sco ave to reviev	ope. We indicate w further to confin	d that that we re m treatment. Wi	ecalleo /ill nee	d that this instrun d to be prepared	nentation would be in-s to discuss this issue f	cope but that urther.	
Date Received:	5/18/2005	Potential Submittal on	Pote Upd	ential LRA ate Require	ed A	Assoc LRA Sectio	on - 2.5.1					
Draft Response:	Regulatory Guid	le 1.97 Compone	nts Position St	atement								
	10 CFR 54 defir components; 2) analyses or plan	nes the requirement Non safety-relate the valuations ass	ents of systems ed systems stru sociated with th	s, structures uctures and ne identified	s, and compo components regulated ev	onents within the s s affecting safety- vents. See Attacl	scope of Licens related compon nment 1.	se Ren nents; a	newal. This inclue and 3) Systems,	des: 1) Safety-related structures, and compo	systems, structures, and nents relied on in safety	ł /
	10 CFR 54.4 de Attachment 2. T which are includ RG 1.97 compo	fines safety-relate These subparagra led under the imp nents.	ed using the cri aphs do not inc ortant to safety	iteria provid clude Regul y paragraph	led by 10 CF atory Guide 1 but are not,	R 50.49(b)(1). S 1.97 components by definition, saf	afety-related is . Regulatory G ety-related and	define Guide 1 theref	ed by 10 CFR 50. 1.97 (RG 1.97) co fore not within the	.49(b)(1)(i) subparagra omponents are covere e scope of License Rei	phs (A), (B) and (C). Se d in 10 CFR 50.49(b)(3) newal, as a result of beir	e ng
	NSP Commitme with a special co (ALEX). The Sa included within t	nt Number M870 oncerns code. Re afety Related colu he scope of Lice	28A required the gulatory Guide Imn in ALEX de Inse Renewal for	he Q-list ex e 1.97 Cate esignates c or reasons	tension to ind gory 1 and 2 omponents th other than RC	clude items relate 2 components wer hat are Safety Re G 1.97.	ed to Regulatory re identified with elated or have so	y Guide h a "Y" some o	e 1.97. These co ' in the Safety Re other special cond	omponents are identifie elated column in the Lic cerns category. Most o	ed in the site database cense Renewal database of these components we	e ere
	Regulatory Guid handled as com	le 1.97 Category modities, CGCS	1 components components ar	were incluend associat	ded within the ed power sup	e scope of Licens pplies currently b	e Renewal with eing removed fr	n the ex rom the	xception of retire e plant, and the f	d components, spare of following five compone	components, penetratior nts:	າຣ
	Equipment Type INSTR INSTR INSTR INSTR INSTR INSTR	Equipment ID PLR-7251A PR-2994 PY-7251B TI-4072A TY-4072A	System Equip PCT DW PR PCT DRYWI PCT PRIMA PCT DIV 1 PCT DIV 1	ment Name RESS-TOR ELL AND T RY CONT/ TORUS TE TORUS TE	EVL-DW RA ORUS PRES NINMENT WI MP MP	.D-ACCD/RNG SSURE IDE RANGE PI IS	Location ADMIN ADMIN SOLATOR EFT ADMIN ADMIN	n RG	1.97 Category 1 1 1 1 1 1			
	The above listed components are designated Regulatory Guide 1.97 Category 1. These components are color-coded "Orange" on the Q-list extension P&ID, w a special concern (i.e. RG 1.97). These components are all located in a mild environment. None of these components are designated as Safety Related by the None of these components are credited as SBO, EQ, Fire Protection, or ATWS. Therefore, these components are not required to be included within the scope Renewal. Additionally, these components are all instruments, which screen out per NEI 95 10 Appendix B criteria.											S
	With the excepti evaluated to not	on of two compute be within the sco	ter points, all R ope of License	egulatory (Renewal.	Guide Catego	ory 2 components	were included	within	the scope of Lice	ense Renewal. The C	omputer System was	
	Regulatory Guid License Renewa	le Category 3 cor al. However, son	nponents are t ne Category 3 d	ypically cor component	nmercial grad s were includ	de components p ded within the sco	owered by norm pe of License R	nal po Renew	wer supplies. Ca al due to other re	ategory 3 components egulated event criteria.	are not within the scope	; of

Attachment 1

Sorted by Status, NRC Reviewer/Auditor, and RAI/Question Number

Monticello Nuclear Generating Plant License Renewal Audit Questions

§ 54.4 Scope.

(a) Plant systems, structures, and components within the scope of this part are--

(1) Safety-related systems, structures, and components which are those relied upon to remain functional during and following design-basis events (as defined in 10 CFR 50.49 (b)(1)) to ensure the following functions--

(i) The integrity of the reactor coolant pressure boundary;

(ii) The capability to shut down the reactor and maintain it in a safe shutdown condition; or

(iii) The capability to prevent or mitigate the consequences of accidents which could result in potential offsite exposures comparable to those referred to in § 50.34(a)(1), § 50.67(b)(2), or § 100.11 of this chapter, as applicable.

(2) All nonsafety-related systems, structures, and components whose failure could prevent satisfactory accomplishment of any of the functions identified in paragraphs (a)(1)(i), (ii), or (iii) of this section.

(3) All systems, structures, and components relied on in safety analyses or plant evaluations to perform a function that demonstrates compliance with the Commission's regulations for fire protection (10 CFR 50.48), environmental qualification (10 CFR 50.49), pressurized thermal shock (10 CFR 50.61), anticipated transients without scram (10 CFR 50.62), and station blackout (10 CFR 50.63).

Attachment 2

§ 50.49 Environmental qualification of electric equipment important to safety for nuclear power plants.

(a) Each holder of or an applicant for a license for a nuclear power plant, other than a nuclear power plant for which the certifications required under § 50.82(a)(1) have been submitted, shall establish a program for qualifying the electric equipment defined in paragraph (b) of this section.

(b) Electric equipment important to safety covered by this section is:

(1) Safety-related electric equipment. Note 3

(i) This equipment is that relied upon to remain functional during and following design basis events to ensure-

(A) The integrity of the reactor coolant pressure boundary;

(B) The capability to shut down the reactor and maintain it in a safe shutdown condition; or

(C) The capability to prevent or mitigate the consequences of accidents that could result in potential offsite exposures comparable to the guidelines in § 50.34(a)(1), § 50.67(b)(2), or § 100.11 of this chapter, as applicable.

(ii) Design basis events are defined as conditions of normal operation, including anticipated operational occurrences, design basis accidents, external events, and natural phenomena for which the plant must be designed to ensure functions (b)(1)(i) (A) through (C) of this section.

(2) Nonsafety-related electric equipment whose failure under postulated environmental conditions could prevent satisfactory accomplishment of safety functions specified in subparagraphs (b)(1) (i) (A) through (C) of paragraph (b)(1) of this section by the safety-related equipment.

(3) Certain post-accident monitoring equipment. Note 4

Note 3: Safety-related electric equipment is referred to as "Class 1E" equipment in IEEE 323-1974. Copies of this standard may be obtained from the Institute of Electrical and Electronics.

Note 4: Specific guidance concerning the types of variables to be monitored is provided in Revision 2 of Regulatory Guide 1.97, "Instrumentation for Light-Water-Cooled Nuclear Power Plants to Assess Plant and Environs Conditions During and Following an Accident."

Final Response: Regulatory Guide 1.97 Components Position Statement

10 CFR 54 defines the requirements of systems, structures, and components within the scope of License Renewal. This includes: 1) Safety-related systems, structures, and components; 2) Non safety-related systems structures and components affecting safety-related components; and 3) Systems, structures, and components relied on in safety analyses or plant evaluations associated with the identified regulated events. See Attachment 1.

10 CFR 54.4 defines safety-related using the criteria provided by 10 CFR 50.49(b)(1). Safety-related is defined by 10 CFR 50.49(b)(1)(i) subparagraphs (A), (B) and (C). See Attachment 2. These subparagraphs do not include Regulatory Guide 1.97 components. Regulatory Guide 1.97 (RG 1.97) components are covered in 10 CFR 50.49(b)(3) which are included under the important to safety paragraph but are not, by definition, safety-related and therefore not within the scope of License Renewal, as a result of being RG 1.97 components.

Sorted by Status, NRC Reviewer/Auditor, and RAI/Question Number

NSP Commitment Number M87028A required the Q-list extension to include items related to Regulatory Guide 1.97. These components are identified in the site database with a special concerns code. Regulatory Guide 1.97 Category 1 and 2 components were identified with a "Y" in the Safety Related column in the License Renewal database (ALEX). The Safety Related column in ALEX designates components that are Safety Related or have some other special concerns category. Most of these components were included within the scope of License Renewal for reasons other than RG 1.97.

Regulatory Guide 1.97 Category 1 components were included within the scope of License Renewal with the exception of retired components, spare components, penetrations handled as commodities, CGCS components and associated power supplies currently being removed from the plant, and the following five components:

Equipment Type	Equipment ID	System	n Equipment Name	Location	RG 1.97 Category
INSTR	PLR-7251A	PCT	DW PRESS-TOR LVL-DW RAD-ACCD/RNG	ADMIN	1
INSTR	PR-2994	PCT	DRYWELL AND TORUS PRESSURE	ADMIN	1
INSTR	PY-7251B	PCT	PRIMARY CONTAINMENT WIDE RANGE PI IS	SOLATOR EFT	1
INSTR	TI-4072A	PCT	DIV 1 TORUS TEMP	ADMIN	1
INSTR	TY-4072A	PCT	DIV 1 TORUS TEMP	ADMIN	1

The above listed components are designated Regulatory Guide 1.97 Category 1. These components are color-coded "Orange" on the Q-list extension P&ID, which indicates a special concern (i.e. RG 1.97). These components are all located in a mild environment. None of these components are designated as Safety Related by the site Q-list. None of these components are credited as SBO, EQ, Fire Protection, or ATWS. Therefore, these components are not required to be included within the scope of License Renewal. Additionally, these components are all instruments, which screen out per NEI 95 10 Appendix B criteria.

With the exception of two computer points, all Regulatory Guide Category 2 components were included within the scope of License Renewal. The Computer System was evaluated to not be within the scope of License Renewal.

Regulatory Guide Category 3 components are typically commercial grade components powered by normal power supplies. Category 3 components are not within the scope of License Renewal. However, some Category 3 components were included within the scope of License Renewal due to other regulated event criteria.

Attachment 1

§ 54.4 Scope.

(a) Plant systems, structures, and components within the scope of this part are--

(1) Safety-related systems, structures, and components which are those relied upon to remain functional during and following design-basis events (as defined in 10 CFR 50.49 (b)(1)) to ensure the following functions--

(i) The integrity of the reactor coolant pressure boundary;

(ii) The capability to shut down the reactor and maintain it in a safe shutdown condition; or

(iii) The capability to prevent or mitigate the consequences of accidents which could result in potential offsite exposures comparable to those referred to in § 50.34(a)(1), § 50.67(b)(2), or § 100.11 of this chapter, as applicable.

(2) All nonsafety-related systems, structures, and components whose failure could prevent satisfactory accomplishment of any of the functions identified in paragraphs (a)(1)(i), (ii), or (iii) of this section.

(3) All systems, structures, and components relied on in safety analyses or plant evaluations to perform a function that demonstrates compliance with the Commission's regulations for fire protection (10 CFR 50.48), environmental qualification (10 CFR 50.49), pressurized thermal shock (10 CFR 50.61), anticipated transients without scram (10 CFR 50.62), and station blackout (10 CFR 50.63).

Attachment 2

§ 50.49 Environmental qualification of electric equipment important to safety for nuclear power plants.

(a) Each holder of or an applicant for a license for a nuclear power plant, other than a nuclear power plant for which the certifications required under § 50.82(a)(1) have been submitted, shall establish a program for qualifying the electric equipment defined in paragraph (b) of this section.

(b) Electric equipment important to safety covered by this section is:

Sorted by Status, NRC Reviewer/Auditor, and RAI/Question Number

(1) Safety-related electric equipment. Note 3

(i) This equipment is that relied upon to remain functional during and following design basis events to ensure-

(A) The integrity of the reactor coolant pressure boundary;

(B) The capability to shut down the reactor and maintain it in a safe shutdown condition; or

(C) The capability to prevent or mitigate the consequences of accidents that could result in potential offsite exposures comparable to the guidelines in § 50.34(a)(1), § 50.67(b)(2), or § 100.11 of this chapter, as applicable.

(ii) Design basis events are defined as conditions of normal operation, including anticipated operational occurrences, design basis accidents, external events, and natural phenomena for which the plant must be designed to ensure functions (b)(1)(i) (A) through (C) of this section.

(2) Nonsafety-related electric equipment whose failure under postulated environmental conditions could prevent satisfactory accomplishment of safety functions specified in subparagraphs (b)(1) (i) (A) through (C) of paragraph (b)(1) of this section by the safety-related equipment.

(3) Certain post-accident monitoring equipment. Note 4

Note 3: Safety-related electric equipment is referred to as "Class 1E" equipment in IEEE 323-1974. Copies of this standard may be obtained from the Institute of Electrical and Electronics.

Note 4: Specific guidance concerning the types of variables to be monitored is provided in Revision 2 of Regulatory Guide 1.97, "Instrumentation for Light-Water-Cooled Nuclear Power Plants to Assess Plant and Environs Conditions During and Following an Accident."

Audit Question No.: B1.3-01

Source:	SSR Au	dit Status:	Sufficient per NRC	Author:	Tingen	MNGP Owner:	Dave Musolf	Discipline:	Programs			
Question:	:	NRC Scoping a procedures) as assembling the Process, Eleme Topical Report,	nd Screening Audit, p it relates to aging ma se documents it was i ent 9 Administrative C as well as reflect sor	pre-audit informati inagement progra- identified that TR- controls" requires in ne deletions and r	on request, it ms attributes 013, "Technic evision at the evisions to M	em 10, requested to have available for th of corrective actions, confirmation proces cal Report, NUREG 1800 and NUREG 18 annual LRA update submittal to reflect NGP AWIs listed in Tables 1 and 2 of TF	ne NRC audit "Qual ss, and document c 801, Element 7, Co changes with imple R-013.	ity Assurance Program (control." During the audi rrective Actions, Elemer mentation of the NMC C	Guidance (i.e., it preparation in at 8, Confirmation Quality Assurance			
Date Rece	eived:	5/26/2005	Potential [Potential L Update Re	RA	Assoc LRA Section - B1.3						
Draft Resp	onse:	First Annual USAR Supplement will discuss new NMC OQA Plan to be implemented September, 2005.										
Final Resp	onse:	First Annual US	SAR Supplement will of	discuss new NMC	OQA Plan to	be implemented September, 2005.						