



May 12, 2006

L-MT-06-039  
10 CFR 50.90

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

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

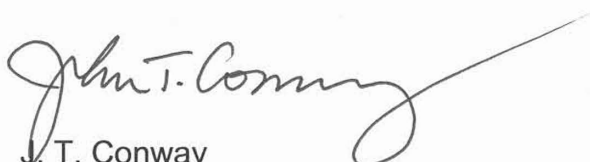
- References:
1. Letter from Nuclear Management Company, LLC, to Document Control Desk, "License Amendment Request: Conversion of Current Technical Specifications (CTS) to Improved Technical Specifications (ITS)," dated June 29, 2005
  2. Letter from Nuclear Management Company, LLC, to Document Control Desk, "Supplement to License Amendment Request: Conversion of Current Technical Specifications (CTS) to Improved Technical Specifications (ITS)," dated April 25, 2006
  3. Letter from Nuclear Management Company, LLC, to Document Control Desk, "Copy of Improved Technical Specifications and Improved Technical Specifications Bases Pages," dated May 4, 2006

Replacement Pages for Improved Technical Specifications 3.5.1

By References 1 and 2, Nuclear Management Company, LLC (NMC) submitted an application and supplement to amend the Technical Specifications of Monticello Nuclear Generating Plant (MNGP) Facility Operating License DPR-22, revising the current Technical Specifications (CTS) to the Improved Technical Specifications (ITS) consistent with the Improved Standard Technical Specifications (ISTS) as described in NUREG-1433, "Standard Technical Specifications General Electric Plants BWR/4," Revision 3, and certain generic changes to the NUREG. Reference 3 provided a complete copy of the Monticello ITS and Revision 0 of the Monticello ITS Bases for issuance with the associated License Amendment Request (LAR) as complete replacements for the existing CTS and CTS Bases and to document two changes from the previously submitted pages.

The purpose of this letter is to provide a replacement page to correct an error in ITS 3.5.1 Condition L. Condition L provides the conditions for when a plant shutdown is required due to inoperabilities in the Emergency Core Cooling Systems. One condition, HPCI System or one or more ADS valves inoperable and Condition D or F entered, was inadvertently excluded. The exclusion is not consistent with the current Technical Specifications (CTS), which do not allow a restoration time when in this condition, and neither References 1 nor 2 provided justification to allow this condition (a shutdown is required in the CTS). The replacement page is included in the Enclosure. A revised Bases page is also provided in the Enclosure.

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



J. T. Conway  
Site Vice President, Monticello Nuclear Generating Plant  
Nuclear Management Company, LLC

Enclosure

cc (w/o enclosure):

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

**Enclosure**

**Replacement Monticello Improved Technical Specifications and Bases Pages**

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>I. HPCI System inoperable.</p> <p><u>AND</u></p> <p>Condition A, B, or C entered.</p>	<p>I.1 Restore HPCI System to OPERABLE status.</p> <p><u>OR</u></p> <p>I.2 Restore low pressure ECCS injection/spray subsystem(s) to OPERABLE status.</p>	<p>72 hours</p> <p>72 hours</p>
<p>J. One ADS valve inoperable.</p>	<p>J.1 Restore ADS valve to OPERABLE status.</p>	<p>14 days</p>
<p>K. One ADS valve inoperable.</p> <p><u>AND</u></p> <p>Condition A, B, or C entered.</p>	<p>K.1 Restore ADS valve to OPERABLE status.</p> <p><u>OR</u></p> <p>K.2 Restore low pressure ECCS injection/spray subsystem(s) to OPERABLE status.</p>	<p>72 hours</p> <p>72 hours</p>
<p>L. Required Action and associated Completion Time of Condition H, I, J, or K not met.</p> <p><u>OR</u></p> <p>Two or more ADS valves inoperable.</p> <p><u>OR</u></p> <p>HPCI System or one or more ADS valves inoperable and Condition D or F entered.</p>	<p>L.1 Be in MODE 3.</p> <p><u>AND</u></p> <p>L.2 Reduce reactor steam dome pressure to <math>\leq 150</math> psig.</p>	<p>12 hours</p> <p>36 hours</p>

BASES

---

## ACTIONS (continued)

K.1 and K.2

If any one low pressure ECCS injection/spray subsystem, or one LPCI pump in both LPCI subsystems, is inoperable in addition to one inoperable ADS valve, adequate core cooling is ensured by the OPERABILITY of HPCI and the remaining low pressure ECCS injection/spray subsystem. However, overall ECCS reliability is reduced because a single failure in one of the remaining OPERABLE subsystems concurrent with a design basis LOCA may result in the ECCS not being able to perform its intended safety function. Since both a high pressure system (ADS) and a low pressure subsystem(s) are inoperable, a more restrictive Completion Time of 72 hours is required to restore either the low pressure ECCS subsystem(s) or the ADS valve to OPERABLE status. This Completion Time is based on a reliability study cited in Reference 11 and has been found to be acceptable through operating experience.

L.1 and L.2

If any Required Action and associated Completion Time of Condition H, I, J, or K is not met, or if two or more ADS valves are inoperable, or if the HPCI System or one or more ADS valves are inoperable and Condition D or F entered, the plant must be brought to a condition in which the LCO does not apply. To achieve this status, the plant must be brought to at least MODE 3 within 12 hours and reactor steam dome pressure reduced to  $\leq 150$  psig within 36 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required plant conditions from full power conditions in an orderly manner and without challenging plant systems.

M.1

When multiple ECCS subsystems are inoperable, as stated in Condition M, the plant is in a condition outside of the accident analyses. Therefore, LCO 3.0.3 must be entered immediately.

---

SURVEILLANCE  
REQUIREMENTSSR 3.5.1.1

The flow path piping has the potential to develop voids and pockets of entrained air. Maintaining the pump discharge lines of the CS System and LPCI subsystems full of water ensures that the ECCS will perform properly, injecting its full capacity into the RCS upon demand. This will