



May 17, 2006

L-MT-06-020
10 CFR 50.55a(g)(5)(iii)

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

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

Clarification to 10 CFR 50.55a Request No. 13: Relief from Impractical Examination Coverage Requirements Pursuant to 10 CFR 50.55a(g)(5)(iii) for the Fourth Ten-Year Inservice Inspection Interval

Reference: 1) NMC to NRC letter, "10 CFR 50.55a Request No. 13: Relief from Impractical Examination Coverage Requirements Pursuant to 10 CFR 50.55a(g)(5)(iii) for the Fourth Ten-Year Inservice Inspection Interval," (L-MT-05-088) dated September 27, 2005.

On September 27, 2005, the Nuclear Management Company, LLC (NMC) submitted a 10 CFR 50.55a request for relief (Reference 1) for certain weld examinations where the coverage required for inservice inspection by Section XI of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code could not be obtained. These examinations were performed during the 2005 refueling outage for the Monticello Nuclear Generating Plant (MNGP).

In response to informal discussions with the NRC staff, this supplement clarifies that relief is not being requested for those areas where coverage is demonstrated by use of the MNGP specific Electric Power Research Institute computer modeling report (Enclosure 1, Reference 1).

This letter contains no new commitments and makes no revisions to existing commitments.



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

Enclosure (1)

cc: Administrator, Region III, USNRC
Project Manager, Monticello, USNRC
Resident Inspector, Monticello, USNRC
Minnesota Department of Commerce (Attn: L. Brandon)

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ENCLOSURE 1
SUPPLEMENT TO 10 CFR 50.55a REQUEST NO. 13
IN ACCORDANCE WITH 10 CFR 50.55a(g)(5)(iii)
INSERVICE INSPECTION IMPRACTICALITY

The Nondestructive Examination (NDE) procedures used at the Monticello Nuclear Generating Plant (MNGP) incorporate examination techniques qualified under Appendix VIII of the ASME Section XI Code by the Performance Demonstration Initiative (PDI) for examination of the subject nozzle-to-vessel shell welds.

The Electric Power Research Institute (EPRI) computer modeling report (Reference 1) was generated to assist NMC in developing and qualifying Ultrasonic Test (UT) examination techniques for the MNGP nozzle inner corner regions and nozzle-to-vessel shell welds. The examinations were performed using a manual contact method from the nozzle outside blend radius and vessel shell surfaces as discussed in the EPRI modeling report and as stated in MNGP procedures. The UT scanning methodology modeled in the EPRI modeling report was applicable to the coverage for the inner corner regions and for the inner 15 percent volume of the nozzle-to-vessel shell welds when scanning parallel to the weld. The examination of the remaining outer 85 percent volume of the nozzle-to-vessel shell welds was based on a separate qualified technique and procedure which did not require use of the EPRI computer modeling report to validate.

The examinations for which relief was requested were not those modeled in the EPRI report for the inner 15 percent of the nozzle-to-vessel shell welds when scanning parallel to the weld. The UT examinations which were limited in coverage involved the remaining outer 85 percent of the required volume when scanning parallel to the weld, and the exam volume required when scanning normal to the weld. Therefore, the utilization of the EPRI computer modeling report for the MNGP has no bearing on the UT examination limitations included in the requested relief.

REFERENCE

1. EPRI Internal Report IR-2004-63, "Monticello Nozzle Inner Radius and Nozzle-to-Shell Weld Examinations."