



September 28, 2006

L-MT-06-061  
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

**Supplement to License Amendment Request: Conversion of Current Technical Specifications (CTS) to Improved Technical Specifications (ITS) (TAC No. MD1294)**

- References:
1. Letter from NMC to NRC, "License Amendment Request: Conversion of Current Technical Specifications (CTS) to Improved Technical Specifications (ITS)," dated June 29, 2005.
  2. License Amendment 146, dated June 5, 2006.

The purpose of this submittal is to request withdrawal of a proposed revision to Improved Technical Specifications (ITS) Limiting Condition for Operation (LCO) 3.5.1, "Emergency Core Cooling System (ECCS) – Operating," Condition D.

In Reference 1, the Nuclear Management Company, LLC (NMC) submitted an application to amend the Technical Specifications for the Monticello Nuclear Generating Plant (MNGP), Facility Operating License DPR-22, revising the current Technical Specifications (CTS) to the ITS consistent with the Improved Standard Technical Specifications as described in NUREG-1433, "Standard Technical Specifications General Electric Plants BWR/4," Revision 3.

In Reference 2, which approved the ITS, the NRC staff stated that they were continuing to review (under TAC No. MD1294) a less restrictive change associated with ITS LCO 3.5.1.D regarding low pressure coolant injection (LPCI) system operability. CTS 3.5.A.3.f addressed LPCI operability associated with a loss of both LPCI injection paths and allowed 72 hours to restore injection path operability. ITS LCO 3.5.1.D addresses the condition by allowing two LPCI subsystems to be inoperable for 72 hours and, therefore, allow three or four LPCI pumps to be inoperable for up to 72 hours. A shutdown was required by CTS if three or more LPCI pumps were inoperable, since CTS 3.5.A.3 did not provide an action condition. Reference 2 stated that pending NRC staff completion of its additional review of this issue, the ITS amendment was issued with the actions described in CTS 3.5.A.3.f, modified only to the extent that it integrated these actions into the ITS format.

Since LCO 3.5.1.D as issued in the ITS is more restrictive than what was originally proposed in Reference 1, and the NMC has determined that operating MNGP in accordance with this requirement is acceptable, NMC requests that the change associated with LPCI, as initially proposed in Reference 1 (ITS 3.5.1, Discussion of Change, Item L.2), be withdrawn.

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

I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 28, 2006



J. T. Conway

Site Vice President, Monticello Nuclear Generating Plant  
Nuclear Management Company, LLC

cc: Administrator, Region III, USNRC  
ITS Project Manager, Monticello, USNRC  
Project Manager, Monticello, USNRC  
Resident Inspector, Monticello, USNRC  
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