April 11, 2008

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

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

Generic Letter 2008-01: Three Month Response to Generic Letter 2008-01

Reference: 1) U.S. NRC Generic Letter 2008-01, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems," dated January 11, 2008.

On January 11, 2008, the U.S. Nuclear Regulatory Commission (NRC) issued Generic Letter (GL) 2008-01, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems," (Reference 1). The generic letter requested each licensee to evaluate the licensing basis, design, testing, and corrective actions for the Emergency Core Cooling Systems (ECCS), Decay Heat Removal System, and Containment Spray System, to ensure that gas accumulation is maintained less than the amount that challenges operability of these systems, and that appropriate action is taken when conditions adverse to quality are identified.

The NRC in GL 2008-01 further requested that if a licensee cannot meet the requested nine month response date, the licensee "shall provide a response within 3 months of the date of this GL." In the three month response, the licensee was requested to describe "the alternative course of action that it proposes to take, including the basis for the acceptability of the proposed alternative course of action."

The enclosure to this letter provides the Nuclear Management Company three month response to Generic Letter 2008-01 for the Monticello Nuclear Generating Plant.

This letter contains the following new commitments:

1. Complete the detailed walkdowns of inaccessible sections of the Generic Letter 2008-01 subject systems prior to startup from the 2009 Refueling Outage.

2. Complete evaluations of the Generic Letter 2008-01 subject systems within 90 days following return to full power from the 2009 Refueling Outage. A summary of the evaluation results will be forwarded to the NRC.

I declare under penalty of perjury that the foregoing is true and correct.
Executed on April 11, 2008.

Bradley J. Sawatzke
Plant Manager, Monticello Nuclear Generating Plant
Nuclear Management Company, LLC

Enclosure

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

ENCLOSURE

NINETY DAY RESPONSE TO GENERIC LETTER 2008-01

On January 11, 2008, the U.S. Nuclear Regulatory Commission (NRC) issued Generic Letter (GL) 2008-01, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems," (Reference 1). The GL requested each licensee evaluate the licensing basis, design, testing, and corrective actions for the Emergency Core Cooling Systems (ECCS), Decay Heat Removal System, and Containment Spray System, to ensure that gas accumulation is maintained less than the amount that challenges operability of these systems, that appropriate action is taken when conditions adverse to quality are identified, and provide a "description of the results of evaluations that were performed" to the NRC.

The NRC further requested that if a licensee could not complete all evaluations within the nine month response date (October 11, 2008), that the licensee "provide a response within 3 months of the date of this GL." In the three month response, the licensee was requested to describe the required evaluations that will not be complete within nine months indicating, "the alternative course of action that it proposes to take, including the basis for the acceptability of the proposed alternative course of action."

For the Monticello Nuclear Generating Plant (MNGP), the scope of evaluations required to support the response to GL 2008-01 includes the following systems:

- High Pressure Coolant Injection (HPCI) System
- Core Spray (CS) System
- Residual Heat Removal (RHR) System (following modes of operation: Low Pressure Coolant Injection (LPCI), Torus Cooling, Shutdown Cooling, and Containment Spray)
- Automatic Depressurization System[1] (ADS)

Scope

The Nuclear Management Company, LLC (NMC) will review and evaluate the licensing and design bases, system operating and test procedures, technical specifications, design drawings and corrective actions pertaining to the above systems. Detailed walkdowns will be performed to confirm items such as adequate vent capability for system high points and verification of the design drawings.

Completion of these evaluations within the schedule provided by the GL will not be possible since portions of the systems (due to the Boiling Water Reactor design) are inaccessible during power operation. In addition, establishment of the proper conditions

1. The ADS remotely operates Safety/relief valves (SRVs) to depressurize the reactor pressure vessel to allow low pressure ECCS system injection. The SRVs are attached to the Main Steam lines, and discharge steam. There is no concern with gas accumulation in either the upstream or downstream lines of the SRV's.

(e.g., installation of scaffolding and shielding) requires planning resources typically associated with an extended duration outage, such as a refueling outage. The following are some of the considerations:

- Walkdowns of these systems would require entry into areas of high radiation or inerted atmosphere (less than 4 percent oxygen concentration inside the Drywell) during power operations.
- Erection of some scaffolding during power operations is impractical due to locations in high radiation areas, or near sensitive or safety related equipment.
- Installation and removal of scaffolding and insulation in the upper levels of the Drywell is prohibited during fuel movements.
- Surveying of areas not routinely accessed, such as overheads, and installation of shielding to reduce exposure to personnel performing inspections would be required.

Walkdowns of the accessible portions of the subject systems will be performed within the nine-month timeframe prescribed by GL 2008-01.

Alternative Course of Action Planned

The NMC does not have a scheduled[(2)] outage prior to the requested completion date of October 11, 2008. The NMC proposes to complete walkdowns for those portions of the subject systems that cannot be performed by October 11, 2008, by the end of the next refueling outage (RFO), scheduled for the spring 2009. The NMC will evaluate the findings of these walkdowns upon completion and enter the findings into the Corrective Action Program. Therefore the NMC is making the following commitments:

1. Complete the detailed walkdowns of inaccessible sections of the Generic Letter 2008-01 subject systems prior to startup from the 2009 Refueling Outage.

2. Complete evaluations of the Generic Letter 2008-01 subject systems within 90 days following return to full power from the 2009 Refueling Outage. A summary of the evaluation results will be forwarded to the NRC.

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2. A shutdown to replace a leaking fuel assembly may occur before the 2009 RFO. Access to the upper levels of the Drywell is prohibited during fuel movement, therefore, this outage is not expected to be of sufficient duration to allow establishment of the conditions necessary to perform detailed walkdowns of these systems.

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Acceptability of the Alternative Course of Action:

This alternative course of action is considered acceptable because MNGP is continuously evaluating for (and resolving if found) gas accumulation issues as a result of site and industry operating experience.

- Surveillance testing is routinely performed on the subject systems and has demonstrated acceptable performance.
- Routine evolutions during plant shutdowns and refueling outages, e.g., RHR shutdown cooling mode for decay heat removal, demonstrate system operability.
- Operating procedures include monthly venting of the low pressure systems to ensure the systems are maintained sufficiently filled. No current issues have been identified during performance of these procedures.
- Venting procedures were improved and vent valves were added in the early 1990's to ensure adequate system venting and filling as part of corrective actions for previous gas accumulation issues.
- A HPCI "keep-fill" system was installed during the last refueling outage to specifically address a gas voiding issue.

Based upon the preceding, the NMC believes that completing performance of the detailed walkdowns on those portions of the subject piping systems requiring refueling outages and subsequent evaluations outside the requested nine month period is an acceptable alternative course of action for the MNGP.

Conclusion

Based on operating experience, testing (performance and surveillance), and prior corrective actions, the NMC has a high confidence that the systems discussed in GL 2008-01 can perform their required design functions at the MNGP. The NMC will complete all of the generic letter requested actions by October 11, 2008 except for the detailed walkdowns and analysis of inaccessible portions of the subject systems, as previously discussed.

REFERENCES

1. U.S. NRC Generic Letter 2008-01, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems," dated January 11, 2008.