

**From:** Peter Tam  
**Sent:** Monday, January 12, 2009 12:50 PM  
**To:** 'Arias, Jesus'; 'Weinkam, Edward J.'; 'Loeffler, Richard A.'  
**Cc:** Michael Norris; Don Johnson; Kevin Williams  
**Subject:** Monticello - Draft RAI re. revision of EAL SG 2.1 (TAC ME0248)

Rick:

The NRC staff is continuing its review of your 5/9/2008 application to revise EAL SG 2.1 for Monticello. The NRC staff determined that the issues set forth in the table below need to be satisfactorily addressed before the review can be brought to completion. Please call me to set up a conference call to discuss these draft questions.

RAI #	EAL	Question
1	SG2.1	The submittal states in several places that emergency action level (EAL) SG2.1 would be declared <u>anytime</u> the Reactor Pressure Vessel (RPV) level is less than minus 149 inches. However, in fact, it is the failure of the reactor to achieve shutdown <u>AND</u> RPV level less than minus 149 inches that are needed for the declaration, not just the loss of RPV level. Please correct the submittal to correct the inconsistency.
2	SG2.1	In Enclosure 1, you state that “Declaring a General Emergency for this situation was not the intent of Revision 4 to NEI 99-01.” Please provide documented evidence to support this statement of intent or revise to ensure that the submittal is based upon fact and site-specific implementation of endorsed NEI guidance and not the assumed intent of the numerous authors of NEI 99-01 Revision 4.
3	SG2.1	Since you are seeking prior NRC approval for a change to SG2.1, explain why you have not taken advantage of this opportunity to align this EAL with the latest NRC endorsed guidance, NEI 99-01 Revision 5. Specifically, paragraphs 1 and 4 of the Basis for SG2.1 should be deleted as they are not applicable to this specific EAL.

**The sole purpose of this e-mail is to prepare you and others for the proposed conference call, during which we will agree on dispositioning the above draft questions. This e-mail does not convey a formal request for additional information, and does not state a formal NRC staff position.**

**Peter S. Tam**, Senior Project Manager  
 Plant Licensing Branch III-1  
 Division of Operating Reactor Licensing  
 Office of Nuclear Reactor Regulation

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