

**Monticello Extended Power Uprate - Draft RAI
From Instrumentation and Controls Branch (EICB)**

Draft RAI-EICB-item 3

Please affirm that all setpoints or allowable value changes in Technical Specifications, within scope of the agreement letter of February 23, 2009, will have the footnotes applied. The **Background** below provides the context to the request for this item.

===== Background to RAI-EICB-item 3 =====

In the license amendment request (LAR) for extended power uprate which was submitted on November 5, 2008, Nuclear Management Company, LLC (the licensee) requested allowable value changes for various Monticello Technical Specification functions. In the LAR the licensee claimed that these functions did not meet the identified criteria for Limiting Safety System Settings (LSSS) that protect a Safety Limit that was under development by the BWR Owners Group in support of Technical Specification Task Force (TSTF)-493, Revision 3, and, therefore, did not propose to add TSTF-493 footnotes for these functions.

Since 2008, discussions between industry and the staff have resulted in agreement on the scope of TS functions which should be annotated with footnotes in TSTF-493 as well as agreement on strategies for adopting TSTF-493. These agreements for the development and adoption of TSTF-493, Revision 4, are reflected in the TSTF letter to the NRC, "Industry Plan to Resolve TSTF-493, Clarify Application of Setpoint Methodology for LSSS Functions," dated February 23, 2009 (ML090540849). The TSTF agreement letter states that TSTF-493 footnotes should be added to all instrument functions in the LCOs for Reactor Trip System (also called Reactor Protection System), the Engineered Safety Feature Actuation System (also called Emergency Core Cooling System) and some instrument functions in other LCOs identified by the BWROG in TSTF-493, Revision 3.

Although the content of TSTF-493, Revision 4, LCOs was finalized by the February 23, 2009 agreement letter, the TSTF-493 Bases are still being worked on. In the interim time period, until the TSTF-493 Bases are finalized and TSTF-493 is issued, it is the NRR staff's expectation that setpoint and allowable value changes that are currently under review should follow the guidance of the TSTF agreement letter. Therefore, Monticello TS functions revised by this amendment request should be annotated with TSTF-493 footnotes.

It should be noted that the licensee has adopted TSTF-493 footnotes for other TS functions for which they agreed were LSSS that protect a Safety Limit.

It is recommended that the licensee submit a revision to their LAR that references the TSTF agreement letter and propose TSTF-493 footnotes for these TS functions. This will ensure that the licensee complies with the requirements of 10 CFR 50.36. The staff will accept footnotes for this function that are identical to footnotes (c) and (d) that are currently included in the Monticello TS for other TS functions.

===== End Background =====

Previous 2 Draft RAI items (Stated here for completeness, not the object of currently requested information)

(1) Enclosure 5, Page 2-104, Table 2.4-1, identifies various instrument setpoints where analytical and/or allowable values have been changed. Provide a summary calculation for the revised setpoints. This summary calculation should provide all the values calculated in accordance with the setpoint methodology, such as acceptable as found band, acceptable as left value, etc., and a reasoned quantitative or qualitative analysis for these values.

(2) The surveillance frequency in TS Section 3.3.1.1, Surveillance Requirement SR 3.3.1.1.6, is proposed to be revised from 2000 effective full power hours to 1770 full power hours, However, no detailed analysis to justify the change was provided. Please provide the calculation to demonstrate the basis for the proposed change.