



August 31, 2009

L-MT-09-047  
10 CFR 50.90

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555-0001

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

Supplement to Extended Power Uprate License Amendment Request: Revision to Proposed Technical Specification Changes in Response to Staff Comments (TAC No. MD9990)

On November 5, 2008, the Northern States Power Company, a Minnesota corporation (NSPM), requested pursuant to 10 CFR 50.90 an amendment to the Monticello Nuclear Generating Plant (MNGP) Renewed Operating License (OL) and Technical Specifications (TS) to increase the maximum authorized power level from 1775 megawatts thermal (MWt) to 2004 MWt (Reference 1 of Enclosure 1).

By letter dated May 13, 2009 (Ref. 2 of Enclosure 1), NSPM provided responses to Instrumentation and Controls Review Branch (EICB) RAIs (References 3 and 4) on the above EPU submittal. Two of the NSPM responses to the EICB RAIs were in part dependent on supplemental changes to the Monticello Technical Specifications (TS). This letter provides these TS changes and completes the NSPM response to EICB RAI No. 2. In addition, an administrative revision to an EPU TS is provided to address a Technical Specification Review Branch (ITSB) recommendation.

Enclosure 1 of this letter provides a description of these supplemental changes. Enclosure 2 provides changes to affected pages of the License Amendment Request supporting documentation. Enclosure 3 provides a marked-up copy of the TS pages showing the proposed revisions. Enclosure 4 provides a copy of the associated draft marked-up TS Bases pages for information. Enclosure 5 of this letter provides NSPM's Response to EICB RAI No. 2

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In accordance with 10 CFR 50.91, a copy of this letter is being provided to the designated Minnesota Official.

Summary of Commitments

There are no new commitments contained in this letter and no existing commitments are revised by this letter.

I declare under penalty of perjury that the foregoing is true and correct.  
Executed on August 31, 2009.

A handwritten signature in black ink, appearing to read "Timothy J. O'Connor". The signature is written in a cursive style with a large initial "T" and "O".

Timothy J. O'Connor  
Site Vice President, Monticello Nuclear Generating Plant  
Northern States Power Company - Minnesota

Enclosures

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

## **ENCLOSURE 1**

### **Evaluation of the Proposed Changes**

- 1.0 BACKGROUND
- 2.0 SUMMARY OF THE PROPOSED CHANGES
- 3.0 ANALYSIS OF THE PROPOSED CHANGES
- 4.0 REGULATORY AND ENVIRONMENTAL ANALYSIS
- 5.0 REFERENCES

## **1.0 BACKGROUND**

Certain revisions to the proposed EPU Technical Specifications have been identified to complete NSPM responses to EICB RAI questions. See NSPM letter dated May 13, 2009 (Ref. 2). These revisions are proposed herein. In addition, NSPM is providing an administrative revision to a previously submitted EPU TS, unrelated to the aforementioned RAI, to address a staff recommendation on the proposed phrasing of the Conditions for TS 3.5.1.

Enclosure 1 of the EPU License Amendment Request (Reference 1) included a table of the Monticello Proposed Operating License and Technical Specification Changes (Table 1). In addition to the proposed changes to the affected TS pages, the completion of the RAI response involves revisions and additions to this table. The Table 1 changes are provided in Enclosure 2 to this letter.

As discussed below, these changes provide additional detail and documentation and do not introduce significant changes to the EPU License Amendment Request. NSPM has evaluated the associated Regulatory Analysis and Environmental Evaluation, and no changes are necessary to these portions of the amendment request.

## **2.0 SUMMARY OF THE PROPOSED CHANGES**

The following additional revisions to the Monticello Technical Specifications (TS) are requested to support the EPU License Amendment (Ref. 1).

- 1) Revise the Allowable Value in TS Table 3.3.6.1-1, Primary Containment Isolation Instrumentation, for Main Steam Line Flow – High (Function 1.c)

This change addresses and completes the NSPM Response to EICB RAI No. 1.

- 2) Revise the calibration frequency for the Local Power Range Monitors in Surveillance Requirement 3.3.1.1.6.

This change addresses and completes the NSPM Response to EICB RAI No. 2.

- 3) Revise the format of the Conditions M and N under Specification 3.5.1, ECCS – Operating.

This administrative change addresses the staff recommendation on phrasing.

The TS mark ups for the above changes are provided in Enclosure 3. The associated TS Bases changes are provided in Enclosure 4.

### 3.0 ANALYSIS OF THE PROPOSED CHANGES

#### 3.1 Main Steam Line Flow – High (Function 1.c) of TS Table 3.3.6.1-1

This change revises the Allowable Value in TS Table 3.3.6.1-1, Primary Containment Isolation Instrumentation, for the Main Steam Line Flow – High (Function 1.c), from  $\leq 142\%$  rated steam flow to  $\leq 123.6\%$  rated steam flow.

By letter dated May 13, 2009 (Reference 2), NSPM identified two errors with the Main Steam Line Flow - High isolation Allowable Value in the EPU documentation.

1. The entry for Main Steam Line (MSL) isolation on high flow in PUSAR<sup>(1)</sup> Table 2.4-1 was incorrectly labeled as an Analytical Limit (AL) instead of an Allowable Value (AV), and the associated EPU AV had been transposed incorrectly from PUSAR page 2-102.
2. The associated TS changes to the AV for the Main Steam Line (MSL) isolation on high flow function had been evaluated but the affected TS pages had inadvertently been omitted from the submittal.

NSPM also indicated that the above changes would be submitted by a supplemental letter. Accordingly, the associated TS changes are included in Enclosure 3. A change to Table 1 of Enclosure 1 of the EPU License Amendment request is also included in Enclosure 2. This table provides the description and basis for the TS change. In addition, the NSPM is providing a marked up PUSAR page to correct the error in item 1 above in Enclosure 2.

The associated TS change represents a correction to an omission made by NSPM in the EPU LAR. The basis for this change has been previously provided and is described in detail in the following docketed correspondences.

- Section 2.4.1.3 of the PUSAR<sup>(1)</sup>
- NSPM response to EICB RAI Question 1 (Reference 2). Please see Item 1, Main Steam High Flow, in the table included in the response to this question.
- MNGP Calculation CA-95-075 Rev. 1, Main Steam Line High Flow Setpoint, which was provided within Enclosure 1 of Reference 2.

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1. The PUSAR was provided as Enclosure 5 to letter L-MT-08-052 (Reference 1).

### 3.2 Revision to RPS Surveillance Requirement 3.3.1.1.6

This change revises the calibration frequency of the Local Power Range Monitors in Surveillance Requirement 3.3.1.1.6 from 2000 Effective Full Power Hours to 1000 MWD/T average core exposure.

The previously submitted change to the LPRM calibration frequency was from 2000 to 1770 Effective Full Power Hours (EFPH). The frequency of 1770 EFPH was determined by a simple scaling method. The staff requested that MNGP provided a more detailed analysis and a calculation to justify the change.

As an alternative, the NSPM proposes to change the value for the LPRM calibration interval to 1000 MWD/T average core exposure as specified in Volume 1 of the BWR4 Standard Technical Specifications (Reference 5 of Enclosure 1).

The proposed change is conservative with respect to LPRM sensitivity since it significantly reduces the EPU calibration frequency to approximately half of the current interval. The basis for the 1000 MWD/T frequency is included in Volume 2 of the BWR4 Standard Technical Specifications (Reference 7 of Enclosure 1), which is cited below and is included in the proposed changes to the TS bases in Enclosure 4.

#### SR 3.3.1.1.6

LPRM gain settings are determined from the local flux profiles measured by the Traversing Incore Probe (TIP) System. This establishes the relative local flux profile for appropriate representative input to the APRM System. The 1000 MWD/T Frequency is based on operating experience with LPRM sensitivity changes.

#### SR 3.3.1.1.9 and SR 3.3.1.1.11

Changes in neutron detector sensitivity are compensated for by performing the ... and the 1000 MWD/T LPRM calibration against the TIPs (SR 3.3.1.1.6).

### 3.3 Revision to Clarify the Conditions of Specification 3.5.1 – ECCS Operating

The proposed change to Conditions M and N of Specification 3.5.1 resulted from a recommendation by the ITSB during a review of the EPU LAR. The proposed change is intended to simplify the TS Conditions in Specification 3.5.1 by grouping the two ADS valve inoperable conditions together.

The ITSB reviewer recommended revising the conditions for one Automatic Depressurization System (ADS) valve inoperable with other Emergency Core

Cooling System (ECCS) components inoperable (which affected Conditions K and L as originally proposed in the EPU LAR). The reviewer recommended revising the list of OR logical operators to group the two or more ADS valve inoperable conditions within Condition K (as submitted in Reference 1) together, thereby removing one extra OR operator.

The proposed TS changes submitted in this letter incorporate the ITSB recommendation.

Since the submittal of the EPU LAR another LAR was approved that revised the Conditions and Required Actions of Specification 3.5.1 (Amendment 162, Reference 6 of Enclosure 1). The EPU proposed changes to Specification 3.5.1 have been revised with consideration of these recently approved changes. Consequently the affected conditions are now Conditions M and N. The revised TS pages reflecting the EPU proposed changes to Specification 3.5.1 are provided in Enclosure 3.

This proposed change is administrative in nature and does not impact the technical content of the proposed TS.

#### **4.0 REGULATORY ANALYSIS and ENVIRONMENTAL EVALUATION**

The proposed changes correct errors and provide additional detail and documentation to the EPU License Amendment Request dated November 5, 2008 (Reference 1 of Enclosure 1). The changes have been evaluated by NSPM and do not involve changes to the associated Regulatory Analysis or the Environmental Evaluation. The proposed changes fall within the scope of the November 2008 EPU submittal, therefore, the No Significant Hazards Determination, and list of Applicable Regulatory Requirements including the Environmental Evaluation were not included in this letter.

## **5.0 REFERENCES:**

1. NSPM letter to NRC, License Amendment Request: Extended Power Uprate (L-MT-08-052) dated November 5, 2008 (TAC No. MD9990) (Accession No. ML083230111)
2. NSPM Letter to NRC, Response to NRC Instrumentation and Controls Branch Request for Additional Information (RAI) dated March 11, 2009, and April 6, 2009, and Fire Protection Branch RAIs dated March 12, 2009 (TAC No. MD9990), LMT-09-026, May 13, 2009
3. Email P. Tam (NRC) to G. Salamon and K. Pointer (NSPM) dated March 11, 2009, "Monticello – Draft RAI from EICB re. Proposed EPU Amendment, (TAC No. MD9990)" (Accession No. ML091030034)
4. Email K. Feintuch (NRC) to K. Pointer (NSPM) dated April 6, 2009, "MD9990-Monticello EPU Additional RAI Item, (TAC No. MD9990)" (Accession No. ML091030034)
5. U.S. NRC, NUREG-1433, "Standard Technical Specification for BWR-4 Plants," Revision 3.1, dated December 1, 2005
6. U.S. NRC letter to the NSPM, "Monticello Nuclear Generating Plant – Issuance of Amendment Regarding Completion Time to Restore a Low-Pressure Emergency Core Cooling Subsystem to Operable Status, dated July 10, 2009
7. U.S. NRC, NUREG-1433, "Standard Technical Specification Bases for BWR-4 Plants," Revision 3.1, dated December 1, 2005

**ENCLOSURE 2**

**MONTICELLO NUCLEAR GENERATING PLANT  
SUPPLEMENTAL TS CHANGES FOR ENCLOSURE 1  
OF THE  
MONTICELLO EPU LICENSE AMENDMENT REQUEST  
DATED NOVEMBER 5, 2008**

**MARKUP PAGE OF ENCLOSURE 7  
OF THE  
MONTICELLO EPU LICENSE AMENDMENT REQUEST  
DATED NOVEMBER 5, 2008**

**Table 1  
Monticello Proposed  
Operating License and Technical  
Specification Changes**

<b>TS Section</b>	<b>Description of Change</b>	<b>Basis for Change</b>
3.3.1.1, RPS Instrumentation SR 3.3.1.1.6	Revise the frequency from 2000 EFPH to 1000 MWD/T average core exposure	Revises the frequency to conform to the BWR4 Standard Technical Specification value for this surveillance requirement.
Table 3.3.6.1-1 Function 1.c	Revise the Allowable Value (AV) from $\leq 142\%$ to $\leq 123.6\%$	<p>Revises the value to reflect the relative change due to the change in rated steam flow at EPU. The differential pressure value across the flow sensors for the EPU AV is the same as that for CLTP.</p> <p>The analytical limit for high main steamline flow isolation for EPU was raised slightly to account for error terms but was maintained well below the steam flow for the flow restrictor in each main steam line. The main steamline high flow analytical limit is ~129% which is well below the restrictor choke flow point specified as 3.227E6 lb/hr or 154.9% of EPU rated steam flow per line.</p>
3.5.1 ECCS Operating	Clarifies the format	Editorial correction in response to NRC Review Branch comment

MARKUP OF TABLE 2.4-1 of ENCLOSURE 7  
of the  
MONTICELLO EPU LICENSE AMENDMENT REQUEST  
DATED NOVEMBER 5, 2008

NEDO-33322, Revision 3

Table 2.4-1 Analytical Limits and Allowable Values for Setpoints

Parameter	Current	EPU
APRM Calibration Basis (MWt)	1775	2004
APRM Neutron Flux High Scram AL	125	No Change
APRM STP (Scram) AVs <sup>1,2</sup>		
TLO (%RTP)	$0.66W + 61.6$	$0.55W + 61.5$
SLO (%RTP)	$0.66(W-\text{delta } W) + 61.6$	$0.55(W-\text{delta } W) + 61.5$
Clamp (%RTP)	116	No Change
APRM STP (Rod Block) AVs <sup>1,2</sup>		
TLO (%RTP)	$0.66W + 55.6$	$0.55W + 55.5$
SLO (%RTP)	$0.66(W-\text{delta } W) + 55.6$	$0.55(W-\text{delta } W) + 55.5$
Clamp (%RTP)	110	No Change
APRM Setdown in Startup Mode AVs		
Scram (%RTP)	20	No Change
Rod Block (%RTP)	15	No Change
Rod Block Monitor AVs	See note 3	No Change
Rod Worth Minimizer LPSP AV (%RTP)	10	No Change
Main Steam Line High Flow Isolation <del>AL</del> (% rated steam flow) AV	142	<del>123.5</del> 123.6
Turbine First-Stage Pressure Scram Bypass AL (%RTP)	45.0%	40.0%
Reactor Water Level -- Low (SCRAM) (inches above indicated zero) (AL)	0	-2.5

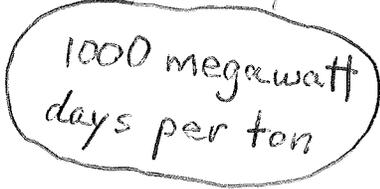
Notes:

1. No credit is taken in any safety analysis for the flow referenced setpoints.
2. The EPU APRM STP Scram and Rod Block clamps remain the same in terms of percent rated power.
3. The cycle specific reload analysis is used to determine any change in the rod block trip setpoint. The RBM trip setpoints listed are based on an Operating Limit Minimum Critical Power Ratio (OLMCPR) of 1.30.

**ENCLOSURE 3**

**MONTICELLO NUCLEAR GENERATING PLANT  
MARKUP OF PROPOSED TECHNICAL SPECIFICATION CHANGES**

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE	FREQUENCY
SR 3.3.1.1.3 -----NOTE----- Not required to be performed when entering MODE 2 from MODE 1 until 12 hours after entering MODE 2. ----- Perform CHANNEL FUNCTIONAL TEST.	7 days
SR 3.3.1.1.4 Perform a functional test of each RPS automatic scram contactor.	7 days
SR 3.3.1.1.5 Perform CHANNEL FUNCTIONAL TEST.	31 days
SR 3.3.1.1.6 Calibrate the local power range monitors.	<del>2000 effective full power hours</del>
SR 3.3.1.1.7 Perform CHANNEL FUNCTIONAL TEST.	92 days
SR 3.3.1.1.8 Calibrate the trip units.	92 days
SR 3.3.1.1.9 Perform CHANNEL CALIBRATION.	92 days
SR 3.3.1.1.10 Perform CHANNEL FUNCTIONAL TEST.	24 months
SR 3.3.1.1.11 -----NOTES----- 1. Neutron detectors are excluded. 2. For Function 1, not required to be performed when entering MODE 2 from MODE 1 until 12 hours after entering MODE 2. 3. For Functions 2.b and 2.f, the recirculation flow transmitters that feed the APRMs are included. ----- Perform CHANNEL CALIBRATION.	24 months  

Primary Containment Isolation Instrumentation  
3.3.6.1

Table 3.3.6.1-1 (page 1 of 3)  
Primary Containment Isolation Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS PER TRIP SYSTEM	CONDITIONS REFERENCED FROM REQUIRED ACTION C.1	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
1. Main Steam Line Isolation					
a. Reactor Vessel Water Level - Low	1, 2, 3	2	D	SR 3.3.6.1.1 SR 3.3.6.1.2 SR 3.3.6.1.3 SR 3.3.6.1.5 SR 3.3.6.1.6	≥ -48 inches
b. Main Steam Line Pressure - Low	1	2	E	SR 3.3.6.1.2 SR 3.3.6.1.4 SR 3.3.6.1.6	≥ 815 psig
c. Main Steam Line Flow - High	1, 2, 3	2 per MSL	D	SR 3.3.6.1.1 SR 3.3.6.1.2 SR 3.3.6.1.4 SR 3.3.6.1.6	≤ <del>112</del> 123.6% rated steam flow
d. Main Steam Line Tunnel Temperature - High	1, 2, 3	2 per trip string	D	SR 3.3.6.1.5 SR 3.3.6.1.6	≤ 209°F
2. Primary Containment Isolation					
a. Reactor Vessel Water Level - Low	1, 2, 3	2	F	SR 3.3.6.1.1 SR 3.3.6.1.2 SR 3.3.6.1.3 SR 3.3.6.1.5 SR 3.3.6.1.6	≥ 7 inches
b. Drywell Pressure - High	1, 2, 3	2	F	SR 3.3.6.1.2 SR 3.3.6.1.4 SR 3.3.6.1.6	≤ 2.0 psig
3. High Pressure Coolant Injection (HPCI) System Isolation					
a. HPCI Steam Line Flow - High	1, 2, 3	2	F	SR 3.3.6.1.2 SR 3.3.6.1.4 SR 3.3.6.1.6	≤ 300,000 lb/hour with ≤ 5.58 second time delay

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
I. Required Action and associated Completion Time of Condition H not met.	I.1 Be in MODE 2.	6 hours
J. HPCI System inoperable.	J.1 Verify by administrative means RCIC System is OPERABLE.  <u>AND</u> J.2 Restore HPCI System to OPERABLE status.	Immediately   14 days
K HPCI System inoperable.  <u>AND</u> Condition A, B, or C entered.	K.1 Restore HPCI System to OPERABLE status.  <u>OR</u> K.2 Restore low pressure ECCS injection/spray subsystem(s) to OPERABLE status.	72 hours   72 hours
L. One ADS valve inoperable.	L.1 Restore ADS valve to OPERABLE status.	14 days
<del>M One ADS valve inoperable.</del>  <del><u>AND</u></del>  <del>Condition A, B, or C entered.</del>	<del>M.1 Restore ADS valve to OPERABLE status.</del>  <del><u>OR</u></del>  <del>M.2 Restore low pressure ECCS injection/spray subsystem(s) to OPERABLE status.</del>	<del>72 hours</del>   <del>72 hours</del>

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p><u>M</u> → <del>#</del> Required Action and associated Completion Time of Condition J, K, L, or <del>M</del> not met.</p> <p><u>OR</u></p> <p>Two or more ADS valves inoperable.</p> <p><u>OR</u></p> <p>HPCI System <del>or one or more ADS valves inoperable</del> and Condition D, E, F, or H entered.</p>	<p><del>#</del>1 Be in MODE 3.</p> <p><u>AND</u></p> <p><del>#</del>2 Reduce reactor steam dome pressure to ≤ 150 psig.</p> <p><u>OR</u></p> <p>One ADS valve inoperable and Condition A, B, C, D or H entered.</p>	<p>12 hours</p> <p><u>M</u></p> <p>36 hours</p>
<p><u>N</u> → <del>#</del> Two or more low pressure ECCS injection/spray subsystems inoperable for reasons other than Condition C, D, E, F, or H.</p> <p><u>OR</u></p> <p>HPCI System and one or more ADS valves inoperable.</p>	<p><del>#</del>1 Enter LCO 3.0.3.</p> <p><u>N</u></p>	<p>Immediately</p>

**ENCLOSURE 4**

**MONTICELLO NUCLEAR GENERATING PLANT**

**MARKUP OF PROPOSED TECHNICAL SPECIFICATION BASES PAGES**

**(FOR INFORMATION)**

BASES

SURVEILLANCE REQUIREMENTS (continued)

SR 3.3.1.1.4

A functional test of each automatic scram contactor is performed to ensure that each automatic RPS logic channel will perform the intended function. There are four RPS channel test switches, one associated with each of the four automatic trip channels (A1, A2, B1 and B2). These test switches allow the operator to test the OPERABILITY of the individual trip logic channel automatic scram contactors as an alternative to using an automatic scram function trip. This is accomplished by placing the RPS channel test switch in the test position, which will input a trip signal into the associated RPS logic channel. The RPS channel test switches are not credited in the accident analysis, they just provide a method to test the automatic scram contactors. The Manual Scram Functions are not configured the same as the generic model used in Reference 16. However, Reference 16 concluded that the Surveillance Frequency extensions for RPS Functions were not affected by the difference in configuration since each automatic RPS logic channel has a test switch that is functionally the same as the manual scram switches in the generic model. As such, a functional test of each RPS automatic scram contactor using either its associated test switch or by test of any of the associated automatic RPS Functions is required to be performed once every 7 days. The Frequency of 7 days is based on the reliability analysis of Reference 16.

SR 3.3.1.1.5

A CHANNEL FUNCTIONAL TEST is performed on each required channel to ensure that the channel will perform the intended function. A successful test of the required contact(s) of a channel relay may be performed by the verification of the change of state of a single contact of the relay. This clarifies what is an acceptable CHANNEL FUNCTIONAL TEST of a relay. This is acceptable because all of the other required contacts of the relay are verified by other Technical Specification and non-Technical Specification tests at least once per refueling interval with applicable extensions. The 31 day Frequency is based on engineering judgment, operating experience, and reliability of this instrumentation.

1000 megawatt days per ton

SR 3.3.1.1.6

LPRM gain settings are determined from the local flux profiles measured by the Traversing Incore Probe (TIP) System. This establishes the relative local flux profile for appropriate representative input to the APRM System. The ~~2000 effective full power hour~~ Frequency is based on operating experience with LPRM sensitivity changes.

BASES

SURVEILLANCE REQUIREMENTS (continued)

SR 3.3.1.1.9 and SR 3.3.1.1.11

A CHANNEL CALIBRATION is a complete check of the instrument loop and the sensor. This test verifies that the channel responds to the measured parameter within the necessary range and accuracy.

CHANNEL CALIBRATION leaves the channel adjusted to account for instrument drifts between successive calibrations consistent with the plant specific setpoint methodology. For the APRM Simulated Thermal Power - High Function, this SR also includes calibrating the associated recirculation loop flow channel.

Note 1 to SR 3.3.1.1.11 state that neutron detectors are excluded from CHANNEL CALIBRATION because they are passive devices, with minimal drift, and because of the difficulty of simulating a meaningful signal. Changes in APRM neutron detector sensitivity are compensated for by performing the 7 day calorimetric calibration (SR 3.3.1.1.2) and the ~~2000 effective full power hours~~ LPRM calibration against the TIPs (SR 3.3.1.1.6). Changes in IRM neutron detector sensitivity are compensated for by periodically evaluating the compensating voltage setting and making adjustments as necessary. Note 2 to SR 3.3.1.1.11 requires the IRM SRs to be performed within 12 hours of entering MODE 2 from MODE 1. Testing of the MODE 2 IRM Functions cannot be performed in MODE 1 without utilizing jumpers, lifted leads, or movable links. This Note allows entry into MODE 2 from MODE 1 if the associated Frequency is not met per SR 3.0.2. Twelve hours is based on operating experience and in consideration of providing a reasonable time in which to complete the SR. Note 3 is added to SR 3.3.1.1.11 to clarify that the recirculation flow transmitters that feed the APRMs are included in the CHANNEL CALIBRATION.

The Frequency of SR 3.3.1.1.9 is based upon the assumption of a 92 day calibration interval in the determination of the magnitude of equipment drift in the setpoint analysis. The Frequency of SR 3.3.1.1.11 is based upon the assumption of a 24 month calibration interval in the determination of the magnitude of equipment drift in the setpoint analysis. The Frequency of SR 3.3.1.1.11 for the APRM / OPRM functions is based upon a 24 month calibration interval (Refs. 17 and 21).

SR 3.3.1.1.11 for Function 2.c, APRM Neutron Flux - High, is modified by two Notes. This function was determined by the NRC Safety Evaluation for Amendment 159 (Ref. 24) to be a LSSS for the protection of the reactor core SLs.

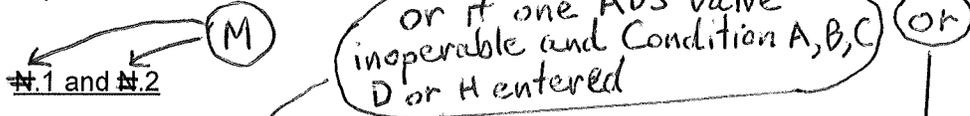
1000 megawatt days per ton

BASES

ACTIONS (continued)

~~M.1 and M.2~~

~~If any one low pressure ECCS injection/spray subsystem, or one LPCI pump in both LPCI subsystems, is inoperable in addition to one inoperable ADS valve, adequate core cooling is ensured by the OPERABILITY of HPCI and the remaining low pressure ECCS injection/spray subsystem. However, overall ECCS reliability is reduced because a single failure in one of the remaining OPERABLE subsystems concurrent with a design basis LOCA may result in the ECCS not being able to perform its intended safety function. Since both a high pressure system (ADS) and a low pressure subsystem(s) are inoperable, a more restrictive Completion Time of 72 hours is required to restore either the low pressure ECCS subsystem(s) or the ADS valve to OPERABLE status. This Completion Time is based on a reliability study cited in Reference 11 and has been found to be acceptable through operating experience.~~



If any Required Action and associated Completion Time of Condition J, K, L ~~or M~~ is not met, *or if two or more ADS valves are inoperable*, or if the HPCI System ~~or one or more ADS valves are inoperable~~ and Condition D, E, F or H entered, the plant must be brought to a condition in which the LCO does not apply. To achieve this status, the plant must be brought to at least MODE 3 within 12 hours and reactor steam dome pressure reduced to ≤ 150 psig within 36 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required plant conditions from full power conditions in an orderly manner and without challenging plant systems.

(N) → 3.1

If two or more low pressure ECCS injection/spray systems are inoperable for reasons other than Conditions C, D, E, F or H, the plant is in a degraded condition not specifically justified for continued operation, and may be in a condition outside of the accident analyses. Therefore, LCO 3.0.3 must be entered immediately.

For some cases, per the single failure assumptions of the accident analysis the plant may not be in an unanalyzed condition (Ref. 10) but the allowable duration for operation in the condition has not been justified, therefore LCO 3.0.3 must be entered immediately.

**ENCLOSURE 5**

**NSPM RESPONSE TO EICB RAI No. 2 DATED MARCH 11, 2009**

### **NRC EICB No 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.

### **NSPM Response**

NSPM will revise the calibration interval of the local power range monitor in TS Surveillance 3.3.1.1.6 to 1000 MWD/T. The proposed calibration interval is more conservative than the existing interval (more than the current frequency) and is consistent with the BWR 4 Standard Technical Specifications for EPU. A markup of the TS that will replace the one previously submitted is contained in Enclosure 3 of this letter.